

Report on Questionnaire Answers

Questionnaire: Local Plan 2020

Question: [5: Priorities] Do you have any comments on the potential priorit...

Respondent Name	User Response: Text	Response Created
Adam Gould	<p>New priority – Establish a methodology for setting settlement boundaries within south glos. and review historically established settlement boundaries to ensure they are set logically and support sustainable development.</p> <p>New priority – Recognize there is a difference between large developers who are trying to maximise their wealth and villagers who are trying to help improve the quality of life for their mothers, fathers, daughters and sons. Why not give weight to allowing conversions of buildings or development of granny annexes for people who are trying to care for their disabled son or their frail mother.</p>	27 Feb 2021
Alan Jones - Hanham & District Greenbelt Conservation Society	<p>The schedule of issues, is a ‘brain storm’ mix of essential items to be considered. The list contains a number of ‘statutory priorities’ which surely must already be in the process of forward planning by SGC (Climate change/ air quality/ flood risk analysis/ health services/ school provision/ blue light services/ renewable energy/ minerals/ Drainage/ sewerage/waste etc.)</p> <p>Central Government expenditure to achieve these aspirations will obviously be necessary, as these issues cannot be realised without establishing the budget for infrastructure renovation and improvement.</p>	26 Feb 2021
Alice Di-Duca	<p>It’s great words but needs to actually follow through - you can’t say promoting the environment then agree 100s of houses all crammed together with postage stamp gardens and tiny roads all built on fields/ green belt and argue that was an exception to your priorities because of x y and z</p>	10 Jan 2021
Amanda Grundy - Natural England	<p>Priorities:</p> <p>The proposed priorities appear reasonable, including the urgent need to mitigate and adapt to Climate Change, to protect the natural environment and to ensure high quality multifunctional green infrastructure is planned and provided to secure the greatest social, economic and environmental benefits.</p> <p>Inevitably there are potential conflicts between priorities, for example to protect and enhance the built and natural environment and to meet housing and societal development needs, although this will depend to some degree on the location, scale, type and design of new development.</p> <p>Natural England regards green infrastructure as being essential to achieving sustainable development, as such we recommend that it is listed alongside other types of supporting infrastructure like transport, power, water and sewage, as these matters should all be considered and properly planned from the outset. We would encourage the Council to recognise green infrastructure as being a requirement for growing communities, alongside other infrastructure in priority 9. Ensuring the timely and efficient provision of infrastructure to support growing communities – indeed the early phasing of green and other supporting infrastructure will be</p>	30 Mar 2021

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	essential to avoid creating isolated and otherwise unsustainable developments.	
Amy Gould	New priority – Review all historically established settlement boundaries against a new (and published) methodology to ensure they are set logically and support sustainable development.	28 Feb 2021
Andrew Rigler	I fully agree and endorse the response provided by TRAPPD.	31 Jan 2021
Andrew Shore	As per my comments under Issues above	01 Mar 2021
Angela Chapman	The priority should be to make sure that Thornbury remains as a town with age groups across the board, but with increased infrastructure such as parking, doctors , education but to protect the historical background. The surrounding villages should remain as villages not be joined up with the town. The space in between needs to remain to sustain the wildlife which is now at home and stable, any further disruption will change the balance of the wildlife	23 Feb 2021
Angela Crabtree	Please see the Trapp'd Response. (Thornbury Residents Against Poorly Planned Development)	28 Feb 2021
Anne Thomson - Burbank Neighbourhood Watch	No	21 Jan 2021
Annette McLaren	Priority must be to refurbish existing urban areas and enhance air quality and increase housing development via replacement of existing industrial areas	28 Feb 2021
Ann O'Driscoll - North Bristol SusCom Ltd	We are particularly supportive of the following priorities: Pursue a carbon neutral and resilient future in a changing climate Minimise the need to travel, and where travel is necessary, decarbonise it by prioritising walking, cycling and effective public transport. Development that promotes health and well-being Enable more active lifestyles including play, walking, cycling and sport. Ensure new homes, workplaces and streets provide high quality residential amenity, private space and internal layouts. Creating exceptional places and spaces Respond to key natural, built, historic and landscape assets and local character to create high-quality developments, which add to, or create, a sense of place. New communities should be designed to be walkable and cyclable neighbourhoods. Enable a productive, clean and inclusive economy Ensure a balanced range of safeguarded employment land across South Gloucestershire, so that all communities have access to job opportunities that are accessible by walking, cycling and effective public transport. Achieving sustainable travel and transport	01 Mar 2021

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	<p>All bullet points</p> <p>Ensuring the timely and efficient provision of infrastructure to support growing communities</p> <p>All bullet points</p>	
Ashfield Land	<p>Please see enclosed representations.</p> <p>7.3 Whilst we agree with the priorities set out we feel that SGC should prioritise and streamline these further in the next stage of the Plan process. It should also be recognised that some of the priorities and their objectives are likely to conflict with one another and SGC therefore need to make a decision about which issues are more important than others.</p> <p>7.4 In our view, the priorities should focus on achieving sustainable travel and transport; enabling a productive, clean and inclusive economy in light of COVID-19; and providing the right type and number of new homes for the Authority area in the areas where demand is highest and sustainable patterns of transport can be engendered.</p>	31 Mar 2021
ATA Estates (Longwell Green) LLP and Sovereign Housing Association	<p>It is not clear whether the priorities are intended to have equal importance or are listed in priority order. If it is the latter, then this would suggest a focus on Carbon reductions and the climate emergency over future housing and business needs and should be clearly stated. Ultimately, economic conditions will be a key factor in achieving future prosperity in the area which in turn will assist the Council in meeting its other priorities.</p> <p>Principle 5: Planning for urban and rural areas:</p> <p>Whilst ‘Optimising the quality, density and range of uses being developed in urban areas and on Brownfield sites’ is in general a sound principle it is not clear what this will mean in practice and how it will affect other principles such as meeting housing and employment needs. This will no doubt be a matter for future stages of the Local Plan review. However, as evidence of the availability of Brownfield land already exists it would have been useful to understand what capacity for growth exists in the urban area. This could have been expressed as a minimum and maximum.</p> <p>The fourth bullet of Principle 5 states ‘If the Bristol and Bath Green Belt is reviewed, and parts of it are required to meet growth needs, ensure its long-term purpose and function is maintained and its recreational value enhanced.’ It is noted that other than building block 1 all options would potentially require Green Belt review.</p> <p>Principle 6: Provide the right type and number of new homes:</p> <p>Bullet point 1: Allocate sites to deliver new homes to meet the need identified in the West of England Spatial Development Strategy is supported but should be amended to reflect the requirement to provide for objectively assessed needs whilst significantly boosting the supply of houses. It is very unlikely that Bristol will be</p>	06 Apr 2021

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	<p>able to meet its full housing requirement and as a result adjoining Authorities such as South Gloucestershire will need to accommodate unmet need as part of the Duty to Co-operate.</p> <p>Bullet point 2 of Principle 6 states ‘Provide homes that meet the needs of all our communities including Affordable Homes.’ As set out earlier in these representations it is disappointing that the Council has not included some evidence of likely need in South Gloucestershire in the evidence base.</p> <p>It is agreed that ‘a portfolio of sites, of different sizes, in a range of sustainable locations across South Gloucestershire.’ (Bullet Point 3) should be provided as this will help to maintain a sufficient and flexible supply of housing. This will be critical to meet the subsequent stated principle of ‘Provide resilience to our 5-Year supply of housing land’ (Bullet point 4).</p> <p>The principle of Exploring ‘new forms of landownership and delivery models, to deliver a range of housing types’ (Bullet point 5) is supported.</p> <p>The West of England Housing Delivery Strategy (reported to the West of England Joint Committee on 29th January) notes that ‘In the West of England, LiveWest, Sovereign, Curo and Bromford’ have strategic partnerships in place and between them have committed in principle to invest circa £315M in the WofE and to establish a long-term relationship as investment partners.’ This type of approach will help achieve the Housing Delivery Strategy stated aim ‘to increase and accelerate housing delivery of all tenures and the interventions that can be made at strategic, regional level to maximise the impact of collaborative effort.’</p> <p>Principle 7: Enable a productive, clean and inclusive economy:</p> <p>In relation to Bullet point 4 it is important that the Local Plan review seeks to address the objectively assessed need for employment land and jobs rather than the potential less positive requirement identified by the West of England Spatial Development Strategy.</p> <p>Principle 8: Achieving sustainable travel and transport:</p> <p>The aim of ‘Achieving sustainable travel and transport’ is supported as is ensuring that ‘New growth should be in close proximity to existing or new key services and facilities, to create walkable and cycleable neighbourhoods.’</p> <p>Principle 9: Ensuring the timely and efficient provision of infrastructure to support growing communities:</p> <p>It is agreed that ‘New development through its location, design and contribution should support the long-term success and sustainability of Schools, community infrastructure and open spaces’ and that a ‘range of landownership and delivery models’ should be considered. Strategic development sites will need to play a key role in ensuring that community infrastructure, such as Schools, are delivered in a timely manner to avoid a strain on existing facilities.</p>	

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Barratt Homes (Bristol) Ltd	<p>Please see enclosed submission.</p> <p>Potential Priorities:</p> <p>1.32 This is a helpful section of the Plan and we agree with much that is said. We would suggest that further work is necessary to ensure that a robust housing trajectory is capable of being delivered as soon as possible and over the whole of the Plan period in order to meet the tests of soundness as the Plan progresses.</p>	14 Apr 2021
Barrie Hesketh	<p>Villages should have a minimum 1 hour bus service , which could be linked by a circular service.</p>	16 Feb 2021
Barwood Development Securities & The North West Thornbury Landowner Consortium	<p>Potential Priorities:</p> <p>We agree with the range of potential priorities which are set out in the consultation document. A number of these are likely to be addressed through the SDS rather than the new Local Plan; however this is not immediately clear when reading the consultation document.</p> <p>As explained above, there are competing priorities; and Plan-making requires a balance of these priorities to ensure the delivery of sound Local Plan which appropriately addresses the needs of the Plan area (both regional and local).</p> <p>It is the next step, in selecting how these priorities are ‘ranked’ and ‘balanced’ which will be critical in ensuring a robust evidence base supporting the new Plan. It was this next step which comprised the most significant failure of the JSP process; notably that there appeared to be different elements prioritised between the different Authorities, and a different priority justifying the selection of each respective SDL. In taking forward the SDS and new Local Plan to the next stage, a consistent approach to the Spatial Strategy and site selection process will be required across the WECA area to ensure a robust and sound SDS and associated new Local Plans.</p> <p>A number of the priorities identified, for example zero Carbon homes and Biodiversity net gain, are being addressed at the national level; and will not require further consideration within the new Local Plan. Given the timelines for the new Local Plan, with adoption expected in late 2023 at the earliest, these national changes will have been introduced and implemented by this time. We comment on these in more detail below.</p>	12 Apr 2021
BDW South West	<p>Priority 1:</p> <p>BDW agree with the priority of pursuing a Carbon neutral and resilient future and the role that new development can play in this but consideration must also be given to the ever improving take up of electric vehicle ownership and home deliveries which place less pressure on private car use and the potential to greatly improve air quality.</p> <p>As announced in November 2020, the UK Government has taken a big step to ending its contribution to Climate Change while boosting jobs in the process, as the Prime Minister, Transport Secretary and Business Secretary announced the end of</p>	19 Apr 2021

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	<p>the sale of new petrol and diesel cars in the UK by 2030.</p> <p>Priority 2:</p> <p>BDW agree that the environment needs to be protected and enhanced where appropriate but recognition is needed that development can enhance the character and quality of local landscape and improve Biodiversity.</p> <p>Further, through the preparation of landscape and visual assessments, key landscape areas, views and local features which can make a significant contribution to the character, distinctiveness and quality of an area, can continue to be protected while still allowing development.</p> <p>Appropriately designed development incorporating mitigation and enhancement has the potential to deliver a significant net gain in Biodiversity. It is accordingly considered there are no significant ecology issues that would preclude well designed development of the site.</p> <p>Priority 3:</p> <p>BDW welcome the priority of ensuring development promotes health and well-being and recognition should be given to the role that new development in rural communities can play in the ability to encourage more active lifestyles for not only new residents but existing communities.</p> <p>Priority 4:</p> <p>The principles of creating exceptional places and spaces should be actively encouraged and it is considered that this can be best achieved through the allocation and masterplanning of new strategic sites, such as urban extensions, which offer the flexibility to create exceptional places to complement the existing environment.</p> <p>Priority 5:</p> <p>BDW strongly support the need for a full review of the Green Belt the result of which would not be to prejudice the function of the Green Belt but release a proportion of land to deliver sustainable development and deliver required growth further to the Eastern Fringe of Bristol.</p> <p>Priority 6:</p> <p>BDW would agree that sufficient allocations are required in delivering new homes to meet the identified need in the WECA SDS which is yet to be fully established and apportioned between Authorities. It Is further agreed that allocations are required to provide resilience the five-year supply position and that should be maximised as much as possible to provide security.</p> <p>Priority 7:</p>	

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	<p>BDW agree that the Plan needs to consider for employment land and jobs to meet the identified needs of the WECA SDS and would add that in part this need could be met through development of new communities to constitute a mix of residential and employment uses representing genuine sustainable development.</p> <p>Priority 8:</p> <p>BDW agree that sustainable travel and transport needs to be a key priority and development in the form of urban extensions to existing settlements would offer close ties to the existing development landscape while also promoting sustainable travel behaviour through onsite design.</p> <p>Priority 9:</p> <p>BDW agree that the provision of infrastructure to support new communities should be forthcoming in a timely and efficient manner and suggest any new such development to consider this through the appropriate means for example the provision of a new School. Development potential of new major allocations should be assessed in this regard to confirm their acceptability.</p> <p>Any development on the site could help to contribute funding towards infrastructure such as new Schools but also major proposed infrastructure improvements in the local area, including potential contributions towards the future completion of the Avon Ring Road, and proposed J18A on the M4.</p>	
Bloor Homes	<p>2.15 In line with our comments above, it is not clear from the consultation document the relationship between the nLP and the Mayoral SDS. Our understanding was that a number of these priorities will be addressed through the SDS; and as such, we assume they will be revised as the nLP progresses. The Spatial Strategy within the SDS will need to be informed by a consistent evidence base across the three WECA Authorities, and it will be necessary for the evidence bases to align to support the SDS's formation and subsequent Examination.</p> <p>2.16 There are a number of competing priorities, and it will be necessary for the next stage of nLP to clearly identify how these priorities have been balanced, and how they have informed the emerging Spatial Strategy (at both the SDS and Local Plan level) and associated selection of sites. This needs to be clearly expressed through the Sustainability Appraisal, and wider evidence base.</p>	01 Apr 2021
Bloor Homes and Maximus Strategic Warmley Ltd	<p>Please see enclosed submission.</p> <p>Potential Priorities:</p> <p>2.11 Again, our client welcomes the accessible format used in articulating the potential priorities.</p> <p>2.12 This is very helpful and clear. We agree with much that has been said in this respect and therefore limit our comments to the following:</p> <p>2.13 Firstly, in terms of providing the right type and number of new homes, we</p>	29 Mar 2021

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	<p>would urge the Council to focus early on ensuring a robust housing trajectory of different sorts of sites backed up by evidence in respect of their specific deliverability over the course of the Plan period. The Local Plan 2020 Phase 1 Sustainability Appraisal (SA) recognises that “alongside the need to increase housing provision in the future, there is the need to improve the diversity and affordability of stock being delivered” (Page 31). In this respect there is a much greater chance of delivering a robust five-year supply of housing land and ensuring the Plan led system that the Council and communities wish to see.</p> <p>2.14 Secondly, there could be merit in identifying a clearer link between the importance of looking at the location of new homes and new jobs within the Plan area. In this regard, Warmley is well-placed in close proximity to the Emersons Green Enterprise Area, which is home to the Bristol and Bath Science Park and includes the already highly acclaimed National Composites Centre, providing a focal point for the coming together of science, innovation, technology, creative and digital media.</p>	
<p>Bloor Homes South West Ltd - Land at North West Yate</p>	<p>SECTION 4 – POTENTIAL PRIORITIES:</p> <p>Nine potential priorities are identified in this section of the document, broadly speaking we support these aspirations and consider they reflect a suitable range of aspirations for a Local Plan. We have the following comments on this section.</p> <p>Priority 6 seeks to ‘Provide the right type and number of new homes.’ The criteria for this priority includes compliance with the housing need identified in the emerging West of England Spatial Development Strategy (the ‘SDS’). We support this approach as the Local Plan will need to set out the detailed policy and allocations to achieve the growth proposed in the SDS, which is expected to reflect nationally set housing numbers (via the standard methodology) and also account for other relevant local evidence in respect of economic growth, and housing affordability (for example). It is important to ensure the Local Plan is emerging alongside the SDS to avoid delays in delivery of this growth once the quantum has been agreed.</p> <p>There is a pressing need to ensure that the genuine OAN for the West of England is met. There has been a delay to the new Local Plan caused by the withdrawal of the JSP, this has had real consequences for the ability of the region to effectively plan for the level of growth needed. It is important that any housing requirement figure expressed in this Plan needs to be based on a ‘minimum’ or an ‘at least’ figure. This is needed to ensure that there is sufficient flexibility and resilience in the supply of sites to ensure that the planned level of growth is achieved in the requisite timeframe (i.e. there is not an ongoing ‘under-performance’ in respect of delivery relative to planned growth). This is in line with the requirements of the NPPF, and PPG, the Council need to ensure it plans positively to ensure housing needs are met. This is of particular importance to South Gloucestershire, an Authority that has failed to deliver sufficient housing to meet their adopted housing land supply requirement for some years. We welcome the indication that ‘resilience’ will be added to the five year supply (as stated as part of Priority 6), but this aspiration needs to be translated into an actual policy commitment in the Plan. There is a clear District level issue with regards to the level of housing to be planned for in South</p>	<p>25 Mar 2021</p>

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	<p>Gloucestershire as the Authority is on track to fail to deliver the adopted Core Strategy housing requirement within the Plan period to 2027.</p> <p>Priority 6 also states that land and policies should be provided to facilitate the delivery of small sites, and that provision should be made for self-build and custom housing. Whilst some provision can be made for homes from these sources, it is important to set realistic and fully evidenced policy aspirations for these type of sites. The latest full AMR (2019) published by the Council shows that 83% of actual completions in the last year was on sites of over 10 units, i.e. major development sites. There needs to be recognition that major development sites will continue to play the key role in delivery of the housing requirement in the new Plan. Sufficient major sites need to be allocated, and policy should be worded in a way that facilitates the development rather than become too prescriptive, particularly in light of the failure of the Core Strategy to realise completions on allocated sites as expected. If it is a specific policy aspiration to ensure development on small sites can be facilitated, the Council should also consider policy provision to avoid delays to delivery and ensure actual housing is realised on the major development sites that will ultimately make up the majority of the Council's supply.</p>	
<p>Bloor Homes South West Ltd - Land at South Farm</p>	<p>SECTION 4 – POTENTIAL PRIORITIES:</p> <p>Nine potential priorities are identified in this section of the document, broadly speaking we support these aspirations and consider they reflect a suitable range of aspirations for a Local Plan. We have the following comments on this section.</p> <p>Priority 6 seeks to ‘Provide the right type and number of new homes.’ The criteria for this priority includes compliance with the housing need identified in the emerging West of England Spatial Development Strategy (the ‘SDS’). We support this approach as the Local Plan will need to set out the detailed policy and allocations to achieve the growth proposed in the SDS, which is expected to reflect nationally set housing numbers (via the standard methodology) and also account for other relevant local evidence in respect of economic growth, and housing affordability (for example). It is important to ensure the Local Plan is emerging alongside the SDS to avoid delays in delivery of this growth once the quantum has been agreed.</p> <p>There is a pressing need to ensure that the genuine OAN for the West of England is met. There has been a delay to the new Local Plan caused by the withdrawal of the JSP, this has had real consequences for the ability of the region to effectively plan for the level of growth needed. It is important that any housing requirement figure expressed in this Plan needs to be based on a ‘minimum’ or an ‘at least’ figure. This is needed to ensure that there is sufficient flexibility and resilience in the supply of sites to ensure that the planned level of growth is achieved in the requisite timeframe (i.e. there is not an ongoing ‘under-performance’ in respect of delivery relative to planned growth). This is in line with the requirements of the NPPF, and PPG, the Council need to ensure it plans positively to ensure housing needs are met. This is of particular importance to South Gloucestershire, an Authority that has failed to deliver sufficient housing to meet their adopted housing land supply requirement for some years. We welcome the indication that ‘resilience’ will be</p>	<p>26 Mar 2021</p>

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<p>Bloor Homes South West Ltd - Land at Wotton Road</p>	<p>SECTION 4 – POTENTIAL PRIORITIES:</p> <p>Nine potential priorities are identified in this section of the document, broadly speaking we support these aspirations and consider they reflect a suitable range of aspirations for a Local Plan. We have the following comments on this section.</p> <p>Priority 6 seeks to ‘Provide the right type and number of new homes.’ The criteria for this priority includes compliance with the housing need identified in the emerging West of England Spatial Development Strategy (the ‘SDS’). We support this approach as the Local Plan will need to set out the detailed policy and allocations to achieve the growth proposed in the SDS, which is expected to reflect nationally set housing numbers (via the standard methodology) and also account for other relevant local evidence in respect of economic growth, and housing affordability (for example). It is important to ensure the Local Plan is emerging alongside the SDS to avoid delays in delivery of this growth once the quantum has been agreed.</p> <p>There is a pressing need to ensure that the genuine OAN for the West of England is met. There has been a delay to the new Local Plan caused by the withdrawal of the JSP, this has had real consequences for the ability of the region to effectively plan for the level of growth needed. It is important that any housing requirement figure expressed in this Plan needs to be based on a ‘minimum’ or an ‘at least’ figure. This is needed to ensure that there is sufficient flexibility and resilience in the supply of sites to ensure that the planned level of growth is achieved in the requisite timeframe (i.e. there is not an ongoing ‘under-performance’ in respect of delivery relative to planned growth). This is in line with the requirements of the NPPF, and PPG, the Council need to ensure it plans positively to ensure housing needs are</p>	<p>20 Apr 2021</p>

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	<p>met. This is of particular importance to South Gloucestershire, an Authority that has failed to deliver sufficient housing to meet their adopted housing land supply requirement for some years. We welcome the indication that ‘resilience’ will be added to the five year supply (as stated as part of Priority 6), but this aspiration needs to be translated into an actual policy commitment in the Plan. There is a clear District level issue with regards to the level of housing to be planned for in South Gloucestershire as the Authority is on track to fail to deliver the adopted Core Strategy housing requirement within the Plan period to 2027.</p> <p>Priority 6 also states that land and policies should be provided to facilitate the delivery of small sites, and that provision should be made for self-build and custom housing. Whilst some provision can be made for homes from these sources, it is important to set realistic and fully evidenced policy aspirations for these type of sites. The latest full AMR (2019) published by the Council shows that 83% of actual completions in the last year was on sites of over 10 units, i.e. major development sites. There needs to be recognition that major development sites will continue to play the key role in delivery of the housing requirement in the new Plan. Sufficient major sites need to be allocated, and policy should be worded in a way that facilitates the development rather than become too prescriptive, particularly in light of the failure of the Core Strategy to realise completions on allocated sites as expected. If it is a specific policy aspiration to ensure development on small sites can be facilitated, the Council should also consider policy provision to avoid delays to delivery and ensure actual housing is realised on the major development sites that will ultimately make up the majority of the Council’s supply.</p>	
Brian Hackland	<p>Priority 1: Pursue a Carbon Neutral and Resilient Future in a Changing Climate There needs to be more thought (and perhaps a separate, whole-authority strategy) on the programme needed to realise this priority.</p> <p>Priority 2: Protect and Enhance Our Environment Again the comments on the ‘Issues’ (above) apply. South Gloucestershire should embrace the concept and reality of a biodiversity-emergency, in parallel and related to the climate emergency, and its approach to remedying this should show a similar urgency and commitment.</p> <p>Priority 3: Development that Promotes Health and Well-Being This priority should make explicit the implications for development of the third (health) emergency and address the lessons on the importance of localism, community, green space access and mental wellbeing that have emerged from the Covid-19 pandemic.</p> <p>Priority 4: Creating Exceptional Places and Spaces New ‘places and spaces’ are not created in a vacuum. They are created for (as yet unidentified) people who will use and live in them. And they are created in places and spaces that already have people using and living in them. So ‘Creating Exceptional Places and Spaces’ begs the questions of "for whom", and "at the expense of whom", and in whose judgement they are exceptional. The creative process, without engagement with current and potential users, runs the risk of becoming sterile and alienated from lived experience (see proposed Priority 10</p>	26 Feb 2021

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	<p>below).</p> <p>For the new places and spaces to be genuinely exceptional they need to be developed through engagement with, and in sympathy with local people, heritage and history, and natural and built environments. The mechanisms for this need to be set out and mandated through the local plan.</p> <p>Priority 5: Planning for Urban and Rural Areas The ‘Urban Lifestyles’ approach needs to include ensuring access for all urban dwellers to rural areas and the benefits these offer. Similarly, rural dwellers rely on ready access to the facilities and leisure opportunities offered by urban areas. Each needs to be crafted for both those who live there, and those who visit there. Although the existing Green Belt is not set in stone, any review should take into account both its formal role as Green Belt and its importance to rural and urban dwellers as green, natural, biodiverse and carbon-capturing space.</p> <p>Priorities 8 and 9: Achieving Sustainable Travel and Transport; Ensuring the Timely and Efficient Provision of Infrastructure to Support Growing Communities While these potential priorities are important, they will be dependent on decisions on strategic transport infrastructure and priorities. This consultation document rightly leaves in abeyance, at this stage, questions that will be answered by the pending West of England Spatial Development Strategy (e.g., on new homes and jobs provision). However, it is curiously silent on the equivalent West of England Joint Local Transport Plan which sets out very clearly the strategic transport context within which the Local Plan 2020 will operate. This is fundamental to the local plan’s transport aspirations and potential for delivery. For example: the JLTP makes it clear that for its duration the dominant mode of transport will remain private motor vehicles. The local plan proposals fail effectively to address this and explain how it fits with the transport aims and approach, including local transport infrastructure. To give another example, it fails to reflect the commitment in the JLTP to a new Junction 18A on the M4 and its implications for growth, travel and development in the Yate/Chipping Sodbury area and the surrounding settlements and countryside.</p> <p>Proposed New Priority 10: Achieving Equity in Development: The Principle of Reciprocation and Equivalence Through ‘Net Amenity Gain’ There is a gap in the potential priorities list that should be filled by inclusion of a tenth priority – “Achieving equity in development for communities through net amenity gain”. This is touched on under issues 17 and 18, 23 and 24, 25 and 26, 45,46 and 47, and under Priority 4 above.</p> <p>The purpose of Priority 10 would be to address the imbalance at the heart of development planning in the distribution of the downsides and upsides of development between existing and new communities. Particularly with green field development, the bulk of the disbenefits accrue to the ‘host’ communities, while the equivalent benefits are enjoyed by new communities, developers, the land owner and, to an extent, the planning authority. There are also, of course, wider societal benefits of development (and potential disbenefits) that are shared by all, but in an attenuated form. By addressing this disequilibrium the new principle would reduce</p>	

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	<p>the opposition and alienation of local ‘host’ communities to important development, strengthen the role of local elected members and the standing of the local planning authority, speed up the development control process, improve the quality and fit of new development, and increase amenity for society as a whole: a win/win.</p> <p>Green field development does not take place in a vacuum. Although land may be owned by individuals (who may sell it for large amounts of money to developers), many of the benefits of that land, pre development, are enjoyed and valued by the wider local community. This may be directly through the enjoyment of views, the beauty, the use of public footpaths, its fauna and flora, fresh air, light; through emotional connection and identity, its built elements (walls, buildings etc), knowledge of and valuing of its history and connection to the wider locality, or even direct benefits from its current use (buying the hay, the cabbages or the sausages produced from the land). While landowners may be aware of the value of the site to the local community (but powerfully incentivised by its development value to sell nonetheless), developers are often not local, unaware of this, and hence taken by surprise when they encounter strong local antipathy. Local elected representatives may be very aware, but their number will be small amongst the total of Members in a local authority, and their voices, even if heard, may not persuade. The result is that most green field development is experienced by local communities as an unwarranted and profit driven assault on land they cherish and whose benefits they have enjoyed here-to-fore. Is it surprising that such development is so often opposed with vehemence and bitterness?</p> <p>These inequities in the amenity enjoyed from greenfield development (and the perceived violation and destruction of locally valued assets, the over-riding of local views, and the opposition to development that flows from this) generate extra costs for developers through delays and complications, and increase the demands on over-stretched local planning authorities. More worrying for society at large, they result in resentment, alienation from the political process, distrust of public authorities, and damage to community cohesion and buy-in. They leave local communities feeling a loss of local identity, more vulnerable, disempowered and side-lined. By the nature of green field sites, these negatives are felt disproportionately by rural communities. The perceived inability of local elected Members to influence outcomes and protect cherished assets undermines their authority and their ability effectively to represent their constituents.</p> <p>Current development practice runs counter to what is seen as normal in other commercial fields. By failing to take account of the stakes local people have in greenfield sites, the planning system has been unable to reflect them in compensation arrangements. In most other transactions, the transfer of an asset from one person to another (or its destruction by another) includes compensation (a payment) and, usually, consent.</p> <p>The concept of ‘net amenity gain’ addresses this. It recognises the inequity of current planning policy and practice and would provide for compensation for lost amenity. The involvement of local communities (and their elected representatives) with developers in determining the form and extent of amenity loss and</p>	

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	<p>commensurate compensation would be empowering, equitable, a recognition of their stake, and assist buy-in to the development. The local planning authority would remain the independent arbiter of the final package, through its role in determining the application, but the onus would be on the developer to engage with the 'host' community and agree the amenity recompense. For society at large it would result in a more efficient and equitable development control process and the creation of valuable public amenities (which could be enjoyed by both the host and new communities). Current national planning policy and legislation, which allows for 'Section 106 agreements', CIL payments and wide conditioning powers in relation to consents, included mechanisms to allow South Gloucestershire Council to embrace this principle. By doing so South Gloucestershire would improve the fairness of the development control process and smooth its passage.</p>	
<p>Bristol and England Properties (BEP)</p>	<p>3.1 Yes, we are largely supportive of the priorities that have been identified. We provide individual comments on these below.</p> <p>Do you have any comments on the potential priorities?</p> <p>1. Pursue a Carbon neutral and resilient future in a changing climate.</p> <p>3.2 Climate Change is rightly identified as a key issue that the Local Plan should seek to address and we are supportive of the Council's ambitions to achieve Carbon neutrality by 2030.</p> <p>3.3 With regard to Housing Delivery, we agree that it is important for new development to support the de-carbonisation of transport to minimise usage of the private motor vehicle and maximise opportunities for walking and cycling. It will be imperative to locate development where access to existing or new services, facilities, employment opportunities and Public Transport are/will be strong.</p> <p>3.4 Furthermore, the advent of electric vehicles and increased levels of home-working are not reasons that would justify a departure from this approach. This is because there are significant economic and social benefits to ensuring that people can access the services, facilities and jobs through a variety of means.</p> <p>3.5 However, one also needs to be realistic in acknowledging individual travel patterns and behaviours will still mean additional vehicular journeys will be required. This can be mitigated by ensuring that where vehicular journeys will be made, the relative distance required to access services, facilities and employment opportunities are minimised. This would, naturally, support development at existing key settlements and areas with good access to the Bristol Urban Fringe (e.g. Frampton Cotterell).</p> <p>3.6 That said, maximising the potential for sustainable patterns of development will only go so far. A significant contributor to emissions is energy consumption within individual dwellings and, as a result, we also support a requirement for higher energy efficiency standards to minimise energy demand. We note that the Government has now withdrawn its intention to restrict Councils' ability to set higher energy performance standards than those prescribed in the Building Regulations. As such, we would support an approach which sought to achieve a</p>	<p>17 May 2021</p>

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	<p>higher standard than would otherwise be imposed at a national level.</p> <p>3.7 Furthermore, the Government are still pursuing their Future Homes Standard which will require all new homes to be highly efficient with low Carbon heating and zero Carbon ready by 2025. Requiring all new homes to be Carbon neutral upon the Plan's adoption would not be such a significant step up from what will, ultimately, be the status quo moving forward and so we would support this approach.</p> <p>2. Protect and enhance our environment.</p> <p>3.8 The Environment is the next identified theme and, again, we are entirely supportive of the need to ensure that development leads to a betterment of the District's Biodiversity and Green Infrastructure assets and should seek to exceed identified standards where possible.</p> <p>3. Development that promotes health and well-being.</p> <p>3.9 Again, we are generally supportive of this priority and are committed to ensuring that high-quality open space and access to active/Public Transport routes/connections are provided.</p> <p>4. Creating exceptional places and spaces.</p> <p>3.10 All development should aspire to secure the highest standards of urban design and so we fully support the need for areas of growth to be legible, walkable and beautiful places to work, live and play.</p> <p>5. Planning for urban and rural areas.</p> <p>3.11 Naturally, we support any attempts to maximise the development potential within existing urban and rural settlements. However, we also welcome the acknowledgment that this will only go so far in meeting overall housing needs and that greenfield (whether in or beyond the Green Belt) sites will be needed to meet the development needs of the District and other WECA members. We would note that this conclusion is also reached by the Sustainability Appraisal (SA).</p> <p>3.12 For reasons set out later in this document, we consider exceptional circumstances will exist to justify the removal of land from the Green Belt to support the Council's development needs. Where this is necessary, we wholeheartedly support the need to ensure that new boundaries are robust and defensible to improve its important function of restricting further urban sprawl.</p> <p>3.13 We would note that the SA indicates that there will likely be significant sustainability benefits associated with the release of Green Belt land for both strategic and non-strategic levels of development and that this should be explored through the Local Plan process.</p> <p>6. Provide the right type and number of new homes.</p>	

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	<p>3.14 We await the progression of the West of England SDS for further details on the housing requirement that will ultimately be adopted. The only thing we would note is that the Standard Method yields a slightly higher minimum annual requirement than the adopted Core Strategy (1,360 vs 1,412 dwellings per annum).</p> <p>3.15 We are also mindful that there has been a significant increase to Bristol's need following the revisions to the Standard Method (which has added around 830 dwellings to their annual requirement). Given the limited availability of land within Bristol's administrative boundary, it is unlikely that it will be able to meet its previously predicted need, let alone this increased minimum requirement itself.</p> <p>3.16 Furthermore, constraints around Bath will likely limit the scope for it to accommodate some of Bristol's unmet need and so the onus will be on South Gloucestershire (and potentially North Somerset) to assist in meeting Bristol's unmet needs. As such, we would expect South Gloucestershire's minimum housing requirement be uplifted significantly from the standard method figure to account for this.</p> <p>3.17 It will be important for progress to be made on the SDS and to reach a joint position with North Somerset in order to understand how housing will need to be distributed across the region and allow for effective and viable options to be considered.</p> <p>3.18 We welcome the acknowledgment of the difficulties the Council has had with delivery in recent years and we would stress that the deliverability of any strategy should be a central guiding principle for the Plan. Large strategic sites will be essential to securing the overall housing requirement; however, they tend to have long lead in times, can have various complexities and often need to secure enabling infrastructure in advance of their delivery which also leads to the affordable housing provision being significantly below the adopted policy position.</p> <p>3.19 The Council has had first-hand experience of this in recent years with delays to the Cribbs Patchway and East of Harry Stoke New Neighbourhoods being a key reason for their deficient housing land supply position in recent years. This has facilitated significant levels of speculative development at sites beyond the Green Belt, in less sustainable locations, and placed significant pressure on rural communities to make up the shortfall. Such development is not necessarily unsustainable, but it sits outside of the adopted Plan's overarching development framework which would otherwise secure a more socially, environmentally and economically sustainable outcome.</p> <p>3.20 Consequently, it is imperative that the Council identify Strategic Development Locations with deliverability at the forefront of any considerations. Development locations that would require significant upfront enabling infrastructure should be carefully considered against alternative locations with less onerous requirements.</p> <p>3.21 Furthermore, the Council needs to ensure that there is an appropriate balance between strategic sites and non-strategic sites to underpin delivery, particularly in</p>	

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	<p>the early years of the Plan period. An over-reliance on strategic sites increases the risk that housing may not come forward in a timely manner and speculative Planning Applications will be required to make up the shortfall in the context of a deficient housing land supply position. This is something the Council has stated it wishes to avoid.</p> <p>3.22 Non-strategic growth will, therefore, have an important role to play in mitigating potential risks associated with delivery on strategic sites, especially in the early years of the Plan period whilst the latter make their way through the development control process.</p> <p>3.23 Another important factor to consider is the relatively compressed timescale for the Local Plan and how this will affect the delivery of housing. The new Local Plan will cover a period of 15 years which is five years less than the JSP; however, the housing requirement has remained around the same level (c. 80,000 dwellings) for the WECA Authorities[1]. In simple terms, the WoE Authorities are going to have to plan for a similar amount of housing to the JSP in a shorter period of time.</p> <p>3.24 This compressed timescale also means that anticipated delivery from large strategic sites over the Plan period will be reduced, especially when one factors in lead in times and applies realistic trajectories to the delivery of housing[2]. The Phase 1 document has raised the importance of ensuring that the final strategy is deliverable and any slips to delivery on identified strategic sites could have serious consequences for the Council in demonstrating a deliverable supply of housing over the longer-term.</p> <p>3.25 The potential result is that a greater number of SDLs will need to be identified compared with the JSP to mitigate this risk, with the majority of these delivering housing beyond the end of the Plan period. The Local Plan will, therefore, need to take a longer-term view at this stage in the interests of ensuring the medium-term development needs of the District are met.</p> <p>3.26 We would, therefore, strongly urge the Council to review alternative locations for growth and prioritise those which would require significantly less onerous infrastructure to facilitate their delivery and more realistically and reliably deliver the housing the Council needs over the Plan period.</p> <p>3.27 This strategy should also be supplemented by an appropriate level of growth at the rural villages. Development at these villages is often required to ensure their vitality and viability is maintained and to ensure that important services (shops, GP Surgeries, Schools etc) are maintained. The Green Belt constraint at a number of rural villages has limited the scope for development to come forward in recent Decades and this has placed a disproportionate amount of pressure on non-Green Belt settlements (e.g. Falfield and Wickwar).</p> <p>[1] Albeit the distribution is more heavily weighted toward Bristol.</p> <p>[2] The often cited 'From Start to Finish' report by Lichfields should inform these assumptions.</p>	

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	<p>3.28 It is also important to ensure the populations in these villages remain balanced in the interests of supporting their vitality and viability. The lack of starter homes or opportunities for downsizing in these villages mean that young people tend to move out and older people continue to occupy housing that would be more suitable for young and established families. Shifting demographics mean that Schools need to extend their catchments due to the need to ensure a sufficient roll of pupils can be retained to justify the School's continued operation. This is certainly the case in Olveston/Tockington where the local Primary School has had to boost its numbers by taking in students from further afield.</p> <p>3.29 This is not, however, sustainable over the longer term as there are social and environmental benefits associated with children going to School close to home (closer to friends, reduced use of private motor vehicle). Facilitating development within these villages can help to address this imbalance.</p> <p>3.30 Furthermore, the majority of the Green Belt villages are located in close proximity to important settlements or the Bristol Urban fringe. This makes them generally more sustainable locations for growth than their non-Green Belt counterparts.</p> <p>3.31 Appropriate levels of growth at both Green Belt and non-Green Belt villages can help to underpin housing delivery, particularly in the early periods of the Plan period as larger strategic sites navigate their way through the planning process.</p> <p>7. Enable a productive, clean and inclusive economy.</p> <p>3.32 We are generally supportive of this priority and are especially supportive of the need to enhance digital connectivity across the area in light of shifting working patterns as a result of the pandemic.</p> <p>8. Achieving sustainable travel and transport.</p> <p>3.33 Page 47 of the Consultation Document provides a useful summary of travel to work patterns and the level of self-containment (in this context defined by the percentage of people who live and work in the same area) of certain parts of the District. What this illustrates is that not only does the North Fringe of Bristol benefit from high levels of self-containment, but also that it acts as a magnet for the wider South Gloucestershire area with significant levels of in-commuting from Avonmouth, Thornbury, Yate and the Eastern Fringe.</p> <p>3.34 Locating development in close proximity/with good transport access to the Northern Fringe will be important in securing the most sustainable patterns of travel across the District.</p> <p>9. Ensuring the timely and efficient provision of infrastructure to support growing communities.</p> <p>3.35 We support this priority and agree that it is essential that new and growing</p>	

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	<p>communities are supported by an appropriate level of infrastructure to maintain and enhance their general sustainability.</p> <p>3.36 The key, as we have touched on above, is ensuring that the scope and need to deliver this infrastructure does not constrain the timely delivery of housing. This can be achieved through the identification of appropriate and deliverable SDLs, which are underpinned by an appropriate level of non-strategic growth at the rural villages.</p>	
Bristol Zoological Society	<p>Please see enclosed submission.</p> <p>Potential Priorities:</p> <p>5.5 The Society would again welcome the accessible format of this section of the Plan and support much of what is said. The particular priority to issues associated with Climate Change, the environment, health and well being are particularly welcome and indeed are central to the values of the Zoological Society. Likewise, the priorities of creating exceptional places, achieving sustainable travel and an inclusive economy are all welcomed.</p> <p>5.6 Whilst the Zoological Society understands the reason for highlighting the need to “provide the right type and number of new homes” as a priority in this section of the Local Plan, it is thought that perhaps greater emphasis could also be made on supporting the wider economy in general and the visitor economy in particular to balance the detail seen elsewhere in the Plan. That said, the Zoological Society would particularly like to express support for the seventh point, within Priority 7, which would have the Council committed to:</p> <p>“Build on the potential for tourism and the visitor economy in our area.”</p> <p>5.7 There is much to build upon.</p>	25 Mar 2021
Caroline Phillips	<p>Point 1 Pursue a carbon neutral and resilient future in a changing climate (Minimise the need to travel, and where travel is necessary, decarbonise it by prioritising walking, cycling and effective public transport) - Difficult to manage as it's led by occupation and availability of work.</p> <p>Point 2 Protect and enhance our environment (Increase tree cover by requiring tree-planting and require the replacement of valuable trees lost to development.)</p> <p>Developments need to work in harmony with the environment/ecosystem. Replanting trees is not a justification for removing hedges and existing trees.</p> <p>Point 3 Development that promotes health and well-being (Promote healthy lifestyle choices through development, such as avoiding takeaways near schools.)</p> <p>Many areas of SGC offer high street amenities with a poor focus upon fast food</p>	12 Mar 2021

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	<p>outlets, fuelling obesity and poor dietary choices. This should be a wider stance other than simply not locating a fast-food outlet near a school. Improve the high street for all and create improved choice of businesses other than the easy and cheaper 'fast food option'. Litter is regularly thrown from vehicles and left in rural communities/ring road. Further establishments will only serve to increase this issue. Hardly a clean 'lifestyle'. Other countries (Germany) manage this issue far more effectively, limiting the number of outlets in an area.</p> <p>Point 4 Creating exceptional places and spaces (Respond to key natural, built, historic and landscape assets and local character to create high-quality developments, which add to, or create, a sense of place)</p> <p>Focus on the appearance of properties. Common trend in developments in South Gloucestershire where render is used as a design feature (excessively). This is a cheaper way to build and in years to come developments will look poor if not maintained.</p> <p>Point 5 Planning for urban and rural areas (If the Bristol and Bath Green Belt is reviewed, and parts of it are required to meet growth needs, ensure its long-term purpose and function is maintained and its recreational value enhanced) What does this actually mean?</p> <p>Point 6 Provide the right type and number of new homes (Explore new forms of landownership and delivery models, to deliver a range of housing types) Consideration of shared ownership options should include a focus of maintenance of property as a lack of care will affect the appearance of an area for the worst.</p> <p>Point 7 Enable a productive, clean and inclusive economy It isn't clear how the national or local economy will be impacted by changing employment patterns and housing preferences. Doesn't this make it difficult to draw conclusions which objectively reflect the context? Jobs required – needs to provide a wide diversity of local jobs and professions to meet requirements for all levels of resident (for all socio-economic groups.). Tourism – tourism needs to nurture Green spaces. Seek to open old collieries/works as working museums. I would question what can be offered currently as sustainable tourism in South Gloucestershire.</p> <p>Point 8 Achieving sustainable travel and transport Suggests people will be living in a highly densely populated area. The 'Covid' pandemic suggests such a context has fuelled the pandemic and we need to provide more outdoor/Green spaces for people not less. Current public transport connections are poor at best and needs developing with a cost-efficient subsidised system that will persuade people to use them. Current connections for walking, cycling and public transport are not high quality, safe connections. A further park</p>	

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	<p>and ride is needed at the end of the M32 to Bristol to avoid Lyde Green park and ride being overburdened, especially with the CAZ scheme.</p> <p>Point 9 Ensuring the timely and efficient provision of infrastructure to support growing communities</p> <p>More roads simply encourage more cars!</p> <p>What are the sustainable choices you are proposing as currently there are none. Infrastructure should include varied mass transit systems – tram etc</p>	
Cate Davidson - Sodbury Town Council	<p>Affordable Housing needs to be defined. If it has a very specific meaning then this should be made clear.</p> <p>5. As worded 'Planning for Urban and Rural Areas' is not an adequately defined priority. There needs to be an adjective in front of planning such as sensitive, appropriate, sympathetic or intelligent.</p> <p>Alternatively reword this priority along the lines of 'Plan growth to improve sustainability and increase prosperity.</p> <p>6. The right type of homes includes houses of an appropriate style for the area where they are being built. This, combined with the need for zero carbon, energy efficient buildings may increase the cost, but planning policies must be rigorous in ensuring this is achieved.</p>	03 Mar 2021
Catherine Bird	Don't build on the green space around thornbury!	28 Feb 2021
Catherine Graham	as above	08 Feb 2021
CEG and the Charfield Landowners Consortium (CEGCLC)	Please see accompanying covering letter.	23 Apr 2021
Charlcombe Estates	<p>Many Local Plans list priorities but these are seldom carried through into a robust Local Plan which sets out clear policies and proposals for the 20 year period. It is extremely easy to provide a list of priorities but the important part for the Plan is that it is robust, can respond to potential changes during the Plan Period and ultimately delivers.</p> <p>Unfortunately, this has not happened previously in the District and lessons need to be learned.</p>	04 Mar 2021
Chris Rich - Mizmo Communications Ltd	The priorities set out are appropriate for this, or any, Plan. However, the key concern will be how these priorities are achieved, and the role that infrastructure provision has to play in this and the role major infrastructure provision, such as the new Junction 18A on the M4, will play in changing the geography and the	11 Mar 2021

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	interconnectedness of places. The new Junction 18A will significantly influence the pattern of development on the Northern Fringe of Bristol, is a confirmed priority for the Council from decisions taken in 2018 and confirmed through JLTP4 and should be considered as part of any Plan making.	
Chris Stow	<p>I am fine with the potential priorities as long as when all the priorities are considered it will still be possible to build some houses!!</p> <p>The only issue, for me, is to rethink the car reliance piece. Obviously it would be great if we could lots and lots of new homes within walking distance of schools, shops, places of work, entertainment venues etc but in the real world we have to accept that this is not practical in many cases. Now that the government has reduced the timeframe for allowing new petrol and diesel cars to be purchased (now by 2030.....within the new local plan period!!) the concern about the pollution potential of car use should now carry much less weight when deciding suitable locations for housing.</p>	08 Jan 2021
Christina Biggs - Friends of Suburban Bristol Railways	The concept of building on brown land first is a good one, but only if there is adequate public transport - for us this means rail whether "heavy" (conventional) or "light" rail, as set out in the Transport for Greater Bristol Alliance Integrated Transport Plan at tfgb.org	27 Feb 2021
Claire Normoyle	<p>see 9 priorities listed on pages 55 to 58)</p> <ul style="list-style-type: none"> • The 9 priorities listed are mostly valid, but not of equal weight. If these priorities are to be used as criteria for selecting candidate locations for development, they must be given weighted scores, not used as a simple tick list (or incomprehensible set of symbols as was done during the JSP). In our view the first two priorities (carbon neutrality and environmental protection) are more important than the other seven combined, and we would weight it to around 60% of the total score. Furthermore, within each priority a bullet list of attributes is given, but once again they are far from being of equal value. In our view, for each priority a fundamental criterion should be defined and allocated most of the weighting for that overall priority. For example, without such weighting it would be possible for a greenfield site which is miles from areas of employment and served almost exclusively by the private car to claim ‘green credentials’ because it proposes cycle paths and retains some trees. That does not mean that cycle paths and tree retention is irrelevant, but it should not form the basis for preferring a spatially inappropriate location. Given below are our suggestions for the fundamental criteria for the most important of the priorities: <ul style="list-style-type: none"> o Priority 1 (pursue a carbon neutral future): Proximity to employment or availability of existing (or irrevocably committed) mass transit that can be shown to be the commuter means of choice for that location. o Priority2(protectandenhanceourenvironment):Identifyandestablish protection for <ul style="list-style-type: none"> ▪ Land with designated environment features identified on pages 66 to 71, plus Best Most Versatile Land (grades 1 to 3) ▪ Greenfield areas that are most vulnerable to speculative development <p>Our view is that the next five priorities would be ranked in the following order (together with suggested fundamental criteria for each)Priority 5 (Planning for urban and rural areas): Prioritise the need to concentrate development on brownfield sites</p> <ul style="list-style-type: none"> o Priority8(achievingustainabletravelandtransport):growthshouldbe in close proximity to existing facilities. Sites with the reliance on a private car should be 	19 Feb 2021

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	<p>avoided.</p> <ul style="list-style-type: none"> o Priority 9 (ensuring timely and efficient provision of infrastructure to support growing communities): Infrastructure should not be assumed to support any new development that is not already in place or irrevocably committed. This situation is exacerbated given the Government’s extreme situation on public finances. o Priority3(Developmentthatpromoteshealthandwell-being):Issue14 (page 32) concerns accessibility to health services to all, and yet this has not been addressed at all within priority 3 o Priority 4 (creating exceptional spaces): Deploy the ‘15 minute neighbourhood’ policy, or similar, such that all necessary local services are within comfortable walking distance <p>The remaining “priorities” described barely merit mentioning, in our view, and certainly don’t help to direct the choices of where to concentrate new development. Priority 6 (provide the right type and number of new homes) is simply a truism – if this is not achieved then the plan will just be rejected. Priority 7 (Productive, clean, inclusive economy) is just waffle, though the bit about re-thinking town centres could be incorporated into Priority 5.</p>	
Claire Smith	<p>Pursue a carbon neutral and resilient future.</p> <p>Its great to provide walking and cycling facilities but this is not accessible for all such as the elderly and small children.</p> <p>Protect and enhance our environment</p> <p>It would be lovely for trees to be planted in these streets.</p> <p>Provide the right type and number of new homes</p> <p>South Gloucestershire seem to be taking an unfair share of the housing proposed. I hope this will be distributed evenly, in particular with BANES taking their fair share.</p> <p>Ensuring the timely and efficient provision of infrastructure to support growing communities.</p> <p>In the past it has taken years for facilities to be provided to support new housing putting pressure on existing services. These facilities need to be available when required by the new community.</p>	26 Feb 2021
Clara Goss - Redrow Homes Ltd	<p>Priority 2 – Protect and enhance our environment:</p> <p>Pegasus consider that the presence of heritage assets at our client's site should not prevent it from being considered for development that can be accommodated at the site without causing harm in accordance with guidance in the NPPF. Indeed, allowing development at the site will help to deliver the Council's emerging green infrastructure strategy by providing enhanced accessibility to the site and the wider Green Belt from the existing urban area. A Heritage Assessment was submitted with our representations in April 2018.</p>	26 Apr 2021

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	<p>Priority 4- Creating exceptional places and spaces:</p> <p>In accordance with Priority 4 Land off Bristol Road, Hambrook provides the opportunity to;</p> <p>"Respond to key natural, built, historic and landscape assets and local character to create high-quality developments, which add to, or create, a sense of place."</p> <p>The site also provides the opportunity to design a walkable or cycleable neighbourhood owing to its accessibility scoring.</p> <p>Priority 5 – Planning for urban and rural areas:</p> <p>Any review of the Green Belt at Hambrook including our client's site would provide the opportunity to deliver enhanced connectivity to the wider Green Belt to the North of the M4 in accordance with NPPF paragraph 138 which requires the impact of removing land from the Green Belt to be offset;</p> <p>"... through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."</p> <p>Priority 6 – Provide the right type and number of new homes:</p> <p>Pegasus support the provision of a portfolio of sites of different sizes, in a range of sustainable locations across South Gloucestershire and the need to provide resilience to the five-year housing land supply.</p> <p>The need to allocate sites to deliver new homes to meet emerging development needs in the WECA SDS is supported.</p> <p>Priority 8 – Achieving sustainable travel and transport:</p> <p>Pegasus support new growth being in close proximity to existing key services and facilities in order to create walkable and cycleable neighbourhoods.</p>	
Clifton Homes (SW) Ltd	<p>Please see accompanying representations referenced:</p> <ul style="list-style-type: none"> • 482 A3 CC 250221 FINAL Local Plan Reps – Land North of Haw Lane, Olveston. 	24 Mar 2021
Colin Gardner - TRAPP'D	<ul style="list-style-type: none"> • The 9 priorities listed are mostly valid, but not of equal weight. If these priorities are to be used as criteria for selecting candidate locations for development, they must be given weighted scores, not used as a simple tick list (or incomprehensible set of symbols as was done during the JSP). In our view the first two priorities (Carbon neutrality and environmental protection) are more important than the other seven combined, and we would weight it to around 60% of the total score. Furthermore, within each priority a bullet list of attributes is given, but once again they are far from being of equal value. In our view, for each priority a fundamental criterion should be defined and allocated most of the weighting for that overall priority. For example, without such weighting it would be possible for a greenfield 	15 Mar 2021

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	<p>site which is miles from areas of employment and served almost exclusively by the private car to claim ‘green credentials’ because it proposes cycle paths and retains some trees. That does not mean that cycle paths and tree retention is irrelevant, but it should not form the basis for preferring a spatially inappropriate location. Given below are our suggestions for the fundamental criteria for the most important of the priorities:</p> <ul style="list-style-type: none"> o Priority 1 (pursue a Carbon neutral future): Proximity to employment or availability of existing (or irrevocably committed) mass transit that can be shown to be the commuter means of choice for that location. o Priority 2 (protect and enhance our environment): Identify and establish protection for: <ul style="list-style-type: none"> • Land with designated environment features identified on pages 66 to 71, plus Best Most Versatile Land (grades 1 to 3); • Greenfield areas that are most vulnerable to speculative development. <p>Our view is that the next five priorities would be ranked in the following order (together with suggested fundamental criteria for each):</p> <ul style="list-style-type: none"> o Priority 5 (Planning for urban and rural areas): Prioritise the need to concentrate development on Brownfield sites; o Priority 8 (achieving sustainable travel and transport): growth should be in close proximity to existing facilities. Sites with the reliance on a private car should be avoided. o Priority 9 (ensuring timely and efficient provision of infrastructure to support growing communities): Infrastructure should not be assumed to support any new development that is not already in place or irrevocably committed. This situation is exacerbated given the Government’s extreme situation on public finances. o Priority 3 (Development that promotes health and well-being): Issue 14 (page 32) concerns accessibility to health services to all, and yet this has not been addressed at all within Priority 3; o Priority 4 (creating exceptional spaces): Deploy the ‘15 minute neighbourhood’ policy, or similar, such that all necessary local services are within comfortable walking distance. <p>The remaining “priorities” described barely merit mentioning, in our view, and certainly don’t help to direct the choices of where to concentrate new development. Priority 6 (provide the right type and number of new homes) is simply a truism – if this is not achieved then the Plan will just be rejected. Priority 7 (Productive, clean, inclusive economy) is just waffle, though the bit about re-thinking town centres could be incorporated into Priority 5.</p>	
Crest Nicholson	Priority 1:	15 Mar

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South West Ltd	<p>CNSW agree with the priority of pursuing a Carbon neutral and resilient future and the role that new development can play in this but consideration must also be given to the ever improving take up of electric vehicle ownership and home deliveries which place less pressure on private car use and the potential to greatly improve air quality.</p> <p>As announced in November 2020, the UK Government has taken a big step to ending its contribution to Climate Change while boosting jobs in the process, as the Prime Minister, Transport Secretary, and Business Secretary announced the end of the sale of new petrol and diesel cars in the UK by 2030.</p> <p>Priority 2:</p> <p>CNSW agree that the environment needs to be protected and enhanced where appropriate but recognition is needed that development can enhance the character and quality of local landscape and improve Biodiversity.</p> <p>Further, through the preparation of Landscape and Visual Assessments, key landscape areas, views and local features which can make a significant contribution to the character, distinctiveness and quality of an area, can continue to be protected.</p> <p>Priority 3:</p> <p>CNSW welcome the priority of ensuring development promotes health and well-being and recognition should be given to the role that new development in rural communities can play in the ability to encourage more active lifestyles for not only new residents but existing communities.</p> <p>Priority 4:</p> <p>The principles of creating exceptional places and spaces should be actively encouraged but in addition to our comments above about the need for good townscape analysis, we would again stress that in certain rural areas, additional population growth is likely required to in turn make rural areas more walkable and cycleable.</p> <p>Priority 6:</p> <p>CNSW would agree that better planning for rural areas is required in order to meet the increasing housing demand and the requirement to provide for a portfolio of sites of different sizes, in a range of sustainable locations across South Gloucestershire and to provide resilience to the 5-Year supply of housing land.</p> <p>Priority 8:</p> <p>CNSW agree that sustainable travel and transport needs to be a key priority but would refer back to our earlier comments in that in many cases, particularly in rural areas it will be difficult to locate growth in close proximity to existing or new key</p>	2021

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	<p>services and facilities, to create walkable and cycleable neighbourhoods.</p> <p>Recognition must therefore be given to the role that development can play in these locations where increased development can in turn result in new key services and better Public Transport connections.</p>	
<p>Crest Nicholson South West Ltd - Land at Harry Stoke/East of Harry Stoke (South)</p>	<p>Potential Priorities:</p> <p>We agree with the range of Potential Priorities which are set out in the consultation document. A number of these are likely to be addressed through the SDS rather than the new Local Plan; however this is not immediately clear when reading the consultation document.</p> <p>As explained above, there are competing priorities; and Plan-making requires a balance of these priorities to ensure the delivery of sound Local Plan which appropriately addresses the needs of the Plan area (both regional and local).</p> <p>It is the next step, in selecting how these priorities are ‘ranked’ and ‘balanced’ which will be critical in ensuring a robust evidence base supporting the new Plan.</p> <p>A number of the priorities identified, for example zero Carbon homes and Biodiversity net gain, are being addressed at the national level; and will not require further consideration within the new Local Plan. Given the timelines for the new Local Plan, with adoption expected in late 2023 at the earliest, these national changes will have been introduced and implemented by this time. We comment on these in more detail below.</p>	<p>12 Apr 2021</p>
<p>Dan Erben - Thornbury Market Garden</p>	<p>A much higher priority and commitment needs to be assigned to carbon neutrality, environmental protection and non-monetary community benefits (better opportunities for sport, recreation and contact with nature, benefitting mental and physical well-being, sustainable and rewarding job creation, reducing traffic and improving services for local residents). All other priorities should be given a much lower weight. Generally, the relative importance of priorities needs to be much more clear.</p>	<p>23 Feb 2021</p>
<p>Daphne Dunning - Cromhall Parish Council</p>	<p>The environment is obviously a key issue, but awareness needs to be given to the situation that you could create by ignoring the impact of building more homes than an areas infrastructure can cope with, then walking away and penalising the area for being unable to live as your blue print demands.</p> <p>Building with the knowledge that an area will inevitably suffer a detrimental on-cost to the improved circumstances in other areas does not seem like the best plan - specifically referring to the rural north of the county.</p>	<p>03 Mar 2021</p>
<p>Daphne Dunning - Pucklechurch Parish Council</p>	<p>Do you have any comments on the potential priorities?</p> <p>A comprehensive list of priorities has been identified – however, as with the issues what remains to be seen is which of these priorities will be deemed to carry more weight than others when determining locations for development and there are concerns that it will be almost impossible to implement them all.</p>	<p>08 Apr 2021</p>

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	<p>Additional specific comments:</p> <ol style="list-style-type: none"> 1. Pursue a carbon neutral and resilient future in a changing climate (Minimise the need to travel, and where travel is necessary, decarbonise it by prioritising walking, cycling and effective public transport)- Difficult to manage as it's led by occupation and availability of work. 2. Protect and enhance our environment (Increase tree cover by requiring tree-planting and require the replacement of valuable trees lost to development.) Developments need to work in harmony with the environment/ecosystem. Replanting trees is not a justification for removing hedges and existing trees. 3. Development that promotes health and well-being (Promote healthy lifestyle choices through development, such as avoiding takeaways near schools.) Many areas of SGC offer high street amenities with a poor focus upon fast food outlets, fuelling obesity and poor dietary choices. This should be a wider stance other than simply not locating a fast food outlet near a school. Improve the high street for all and create improved choice of businesses other than the easy 'fast food option'. 4. Creating exceptional places and spaces (Respond to key natural, built, historic and landscape assets and local character to create high-quality developments, which add to, or create, a sense of place) Focus on the appearance of properties. Common trend in developments in South Gloucestershire where render is used as a design feature (excessively). This is a cheaper way to build and in years to come developments will look poor if not maintained. 5. Planning for urban and rural areas (If the Bristol and Bath Green Belt is reviewed, and parts of it are required to meet growth needs, ensure its long-term purpose and function is maintained and its recreational value enhanced) What does this actually mean? 6. Provide the right type and number of new homes (Explore new forms of landownership and delivery models, to deliver a range of housing types) Consideration of shared ownership options should include a focus of maintenance of property as a lack of car will affect the appearance of an area for the worst. 7. Enable a productive, clean and inclusive economy It isn't clear how the national or local economy will be impacted by changing employment patterns and housing preferences. Doesn't this make it difficult to draw conclusions which objectively reflect the context? 8. Achieving sustainable travel and transport Suggests people will be living in a highly densely populated area. The 'Covid' pandemic suggests such a context has fuelled the pandemic and we need to provide more space for people not less! 9. Ensuring the timely and efficient provision of infrastructure to support growing communities 	

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	More roads simply encourage more cars!	
David George	Identification of Community energy site	15 Feb 2021
David Grover	Mental health impact on residents in villages where new developments are planned needs to be considered. Most people who live in smaller villages choose to live there because of location and low population (the core reason why they are titled villages). Many residents choose to live in these low population density areas for specific reasons. If new developments are created, they change population density, green space declines and pollution levels rise significantly (noise, emissions etc.). If a small village has no amenities, increasing population increases the need to travel to areas where these amenities can be found. This adversely affects original residents mental health.	25 Feb 2021
David Hathaway	Priority 8 'achieving sustainable travel and transport' is key to achieving the all your environmentally friendly priorities. The emphasis of priority 8 is on transport for social purposes. There needs to be a new priority on sustainable transport to places of employment, especially from market towns and rural locations.	27 Feb 2021
David Heape	<p>Point 1 Pursue a carbon neutral and resilient future in a changing climate (Minimise the need to travel, and where travel is necessary, decarbonise it by prioritising walking, cycling and effective public transport) - Difficult to manage as it's led by occupation and availability of work.</p> <p>Point 2 Protect and enhance our environment (Increase tree cover by requiring tree-planting and require the replacement of valuable trees lost to development.) Developments need to work in harmony with the environment/ecosystem. Replanting trees is not a justification for removing hedges and existing trees.</p> <p>Point 3 Development that promotes health and well-being (Promote healthy lifestyle choices through development, such as avoiding takeaways near schools.)</p> <p>Many areas of SGC offer high street amenities with a poor focus upon fast food outlets, fuelling obesity and poor dietary choices. This should be a wider stance other than simply not locating a fast-food outlet near a school. Improve the high street for all and create improved choice of businesses other than the easy and cheaper 'fast food option'. Litter is regularly thrown from vehicles and left in rural communities/ring road. Further establishments will only serve to increase this issue. Hardly a clean 'lifestyle'. Other countries (Germany) manage this issue far more effectively, limiting the number of outlets in an area.</p> <p>Point 4 Creating exceptional places and spaces (Respond to key natural, built, historic and landscape assets and local character to create high-quality developments, which add to, or create, a sense of place)</p> <p>Focus on the appearance of properties. Common trend in developments in South</p>	12 Mar 2021

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	<p>Gloucestershire where render is used as a design feature (excessively). This is a cheaper way to build and in years to come developments will look poor if not maintained.</p> <p>Point 5 Planning for urban and rural areas (If the Bristol and Bath Green Belt is reviewed, and parts of it are required to meet growth needs, ensure its long-term purpose and function is maintained and its recreational value enhanced) What does this actually mean?</p> <p>Point 6 Provide the right type and number of new homes (Explore new forms of landownership and delivery models, to deliver a range of housing types) Consideration of shared ownership options should include a focus of maintenance of property as a lack of care will affect the appearance of an area for the worst.</p> <p>Point 7 Enable a productive, clean and inclusive economy It isn't clear how the national or local economy will be impacted by changing employment patterns and housing preferences. Doesn't this make it difficult to draw conclusions which objectively reflect the context? Jobs required – needs to provide a wide diversity of local jobs and professions to meet requirements for all levels of resident (for all socio-economic groups.). Tourism – tourism needs to nurture Green spaces. Seek to open old collieries/works as working museums. I would question what can be offered currently as sustainable tourism in South Gloucestershire.</p> <p>Point 8 Achieving sustainable travel and transport Suggests people will be living in a highly densely populated area. The 'Covid' pandemic suggests such a context has fuelled the pandemic and we need to provide more outdoor/Green spaces for people not less. Current public transport connections are poor at best and needs developing with a cost-efficient subsidised system that will persuade people to use them. Current connections for walking, cycling and public transport are not high quality, safe connections. A further park and ride is needed at the end of the M32 to Bristol to avoid Lyde Green park and ride being overburdened, especially with the CAZ scheme.</p> <p>Point 9 Ensuring the timely and efficient provision of infrastructure to support growing communities</p> <p>More roads simply encourage more cars!</p> <p>What are the sustainable choices you are proposing as currently there are none. Infrastructure should include varied mass transit systems – tram etc</p>	
David Price	<p>2.0 Environmental Background:</p> <p>The Council's recognition of the impact of Climate Change and all its associated</p>	25 Mar 2021

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	<p>implications is a practical approach to the environmental change which will continue within the Plan period. It is logical to support those proposals which seek to address those concerns in the context of planning, and more specifically the need for new homes. It is also accepted that the Plan should attempt to balance the competing needs of further homes against other land uses and the environment.</p> <p>The submission notes that the Council is required to accommodate growth in housing numbers and in the absence of suitable Brownfield sites this necessitates the inevitable development of green field land.</p> <p>This submission supports the approach that new development should be as sustainable as possible; both the location and the form of scheme.</p>	
<p>David Redgewell - South West Transport Network and Railfuture Severnside</p>	<p>Public Transport investment needs to be a top priority in the Plan to allow regeneration of the North Fringes area of Bristol and East Bristol and Kingswood former Kingswood Borough Council area.</p> <p>Affordable and social housing needs in both the urban North and East Bristol areas. But especially in Thornbury, Yate, Chipping Sodbury and the Principle rural areas key service village.</p> <p>The Severnside area needs a proper Transport plan for Development around Severn Beach, Cabot Park and Pilning and regeneration plan.</p> <p>The Plan also needs to mention The Great Western Freeport with Portbury Docks in North Somerset Council area.</p> <p>North Somerset Council needs to be part of WECA Mayoral Transport Authority.</p> <p>Great Western Free port also includes land around Bridgwater in Somerset.</p> <p>North Somerset Council, South Gloucestershire city and County of Bristol.</p> <p>This port Severnside development area if the Great Western free port is agreed by Central Government.</p> <p>High Street regeneration is also priority.</p> <p>In Thornbury, Yate, Chipping Sodbury, Downend, Kingswood, Town Centre, Hanham, Emersons Green, Filton and Patchway, Stoke Gifford.</p> <p>More employment land is required in the Thornbury and Charfield area.</p>	<p>28 Feb 2021</p>
<p>Debbie Johnson</p>	<p>I think you have too much emphasis on new homes in the wrong areas.</p>	<p>26 Feb 2021</p>
<p>Diverse Partnerships (In Collaboration With Edward Ware Homes)</p>	<p>Please see submitted Local Plan 2020 Phase 1 Issues and Approaches Consultation Response Document.</p>	<p>05 May 2021</p>

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Dominick Veasey - Nexus Planning Limited	<p>These representations are submitted on behalf of who have interests in Land surrounding the former Shortwood Golf Course, Mangotsfield (“the Lower Shortwood Site”). For reference a Site Location Plan is included as Appendix A.</p> <p>As part of the recent Call for Sites process, a Lower Shortwood Vision Document and accompanying Transport Vision was submitted. The Vision Document sets out the vision for creating a new settlement on the Eastern Fringe of Bristol, which comprises a collection of distinctive neighbourhoods with the principles of sustainability, health and well-being at their core. These representations should be read alongside the previously submitted Lower Shortwood Vision Document and Transport Vision.</p> <p>We broadly support the nine potential priorities that are proposed as the basis for shaping the content and approach of the Local Plan. As demonstrated and set out in detail within the Lower Shortwood Vision Document, the concept and vision of Lower Shortwood fully aligns with the nine proposed priorities. In view of this, the Lower Shortwood Site should be considered as a reasonable option as part of the emerging Local Plan process.</p>	19 Mar 2021
Donna Simmons - Emersons Green Town Council	No	01 Mar 2021
Edward Ware Homes	<p>3.2 Climate Change is rightly identified as a key issue that the Local Plan should seek to address and EWH are wholeheartedly supportive of the Council's ambitions to achieve Carbon neutrality by 2030.</p> <p>3.3 With regard to Housing Delivery, we agree that it is important for new development to support the de-carbonisation of transport to minimise usage of the private motor vehicle and maximise opportunities for walking and cycling. It will be imperative to locate development where access to existing or new services, facilities, employment opportunities and Public Transport are/will be strong.</p> <p>3.4 Furthermore, the advent of electric vehicles and increased levels of home-working are not reasons that would justify a departure from this approach. This is because there are significant economic and social benefits to ensuring that people can access the above through a variety of means.</p> <p>3.5 However, one also needs to be realistic in acknowledging individual travel patterns and behaviours will still mean additional vehicular journeys will be required. This can be mitigated by ensuring that where vehicular journeys will be made, the relative distance required to access services, facilities and employment opportunities are minimised. This would, naturally, support development at existing key settlements (e.g. Coalpit Heath and Yate) and areas with good access to the Bristol Urban Fringe (e.g. Almondsbury).</p> <p>3.6 That said, maximising the potential for sustainable patterns of development will only go so far. A significant contributor to emissions is energy consumption within individual dwellings and, as a result, Edward Ware Homes also support a</p>	05 May 2021

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	<p>requirement for higher energy efficiency standards to minimise energy demand. We note that the Government has now withdrawn its intention to restrict Councils' ability to set higher energy performance standards than those prescribed in the Building Regulations. As such, we would support an approach which sought to achieve a higher standard than would otherwise be imposed at a national level.</p> <p>3.7 Furthermore, the Government are still pursuing their Future Homes Standard which will require all new homes to be highly efficient with low Carbon heating and zero Carbon ready by 2025. Requiring all new homes to be Carbon neutral upon the Plan's adoption would not be such a significant step up from what will, ultimately, be the status quo moving forward and so we would support this approach.</p> <p>3.8 EWH will be acting as the master developer on both of their sites and are committed to ensuring that all new dwellings delivered are Carbon neutral, irrespective of the policy position that will ultimately be adopted.</p> <p>2. Protect and enhance our environment.</p> <p>3.9 The Environment is the next identified theme and, again, EWH are entirely supportive of the need to ensure that development leads to a betterment of the District's Biodiversity and Green Infrastructure assets and should seek to exceed identified standards where possible.</p> <p>3. Development that promotes health and well-being.</p> <p>3.11 Again, EWH are generally supportive of this priority and are committed to ensuring that high quality open space and active transport routes are provided on our sites to support play, walking, cycling and sport.</p> <p>4. Creating exceptional places and spaces.</p> <p>3.12 All development should aspire to secure the highest standards of urban design and so EWH fully support the need for areas of growth to be legible, walkable and beautiful places to work, live and play.</p> <p>5. Planning for urban and rural areas.</p> <p>3.13 Naturally, we support any attempts to maximise the development potential within existing urban and rural settlements. However, we also welcome the acknowledgement that this will only go so far in meeting overall housing needs and that greenfield sites will be needed to meet the development needs of the District and other WECA members. We would note that this conclusion is also reached by the Sustainability Appraisal (SA).</p> <p>3.14 For reasons set out later in this document, we consider exceptional circumstances will exist to justify the removal of land from the Green Belt to support the Council's development needs. Where this is necessary, we wholeheartedly support the need to ensure that new boundaries are robust and</p>	

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	<p>defensible to improve its important function of restricting further urban sprawl. We also support the need to enhance its recreational value and would ensure that new areas of open space are integrated with walking and cycling routes to ensure the benefits accrue to both existing and future residents.</p> <p>6. Provide the right type and number of new homes.</p> <p>3.16 We await the progression of the West of England SDS for further details on the housing requirement that will ultimately be adopted. The only thing we would note is that the Standard Method yields a slightly higher minimum annual requirement than the adopted Core Strategy (1,360 vs 1,412 dwellings per annum).</p> <p>3.17 We are also mindful that there has been a significant increase to Bristol's need following the revisions to the Standard Method (which has added around 830 dwellings to their annual requirement). Given the limited availability of land around Bristol, it is unlikely that it will be able to meet its previous predicted need, let alone this increased minimum requirement itself.</p> <p>3.18 Furthermore, constraints around Bath will likely limit the scope for it to accommodate some of Bristol's unmet need and so the onus will be on South Gloucestershire (and potentially North Somerset) to assist in meeting Bristol's unmet needs. As such, we would expect South Gloucestershire's minimum housing requirement be uplifted significantly from the standard method figure to account for this.</p> <p>3.19 It is also imperative that a significant proportion of this development is well related to the Bristol Urban Area given that it will be looking to meet the needs of residents who need to be functionally well related to it. This would support the delivery of development on important transport routes (MetroBus Routes or the local rail network) which are well related to the Bristol Urban Fringes (Yate, Coalpit Heath, Almondsbury etc).</p> <p>3.20 It will be important for progress to be made on the SDS and a joint position to be reached with North Somerset in order to understand how housing will need to be distributed across the region and allow for effective and viable options to be considered.</p> <p>3.21 We welcome the acknowledgement of the difficulties the Council has had with delivery in recent years and we would stress that the deliverability of any strategy should be a central guiding principle for the Plan. Large strategic sites will be essential to securing the overall housing requirement; however, they tend to have long lead in times, can have various complexities and often need to secure enabling infrastructure in advance of their delivery.</p> <p>3.22 The Council has had first-hand experience of this in recent years with delays to the Cribbs Patchway and East of Harry Stoke New Neighbourhoods being a key reason for their deficient housing land supply position. This has facilitated significant levels of speculative development at sites beyond the Green Belt and placed significant pressure on rural communities to make up the shortfall. Such</p>	

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	<p>development is not necessarily unsustainable, but it sits outside of the adopted Plan's overarching development framework which would otherwise secure a more socially, environmentally and economically sustainable outcome.</p> <p>3.23 That said, there is no hiding from the fact that larger strategic sites will be essential in meeting the Council's housing needs over the next Plan period and can deliver significant benefits through the utilisation of economies of scale and provide a steady supply of dwellings over prolonged period of time.</p> <p>3.24 Consequently, it is imperative that the Council identify Strategic Development Locations with deliverability at the forefront of any considerations. Development locations that would require significant upfront enabling infrastructure should be carefully considered against alternative locations with less onerous requirements.</p> <p>3.25 For example, we note that there have historically been ambitions to pursue a new Garden Village to the North-East of Thornbury (Buckover Garden Village). Whilst this proposed Strategic Development Location was not assessed by Inspectors, significant concerns had been expressed in respect of its ability to come forward in a timely manner given the upfront infrastructure costs that would have been required to deliver it.</p> <p>3.26 Another important factor to consider is the relatively compressed timescale for the Local Plan and how this will affect the delivery of housing. The new Local Plan will cover a period of 15 years which is five years less than the JSP; however, the housing requirement has remained around the same level (c. 80,000 dwellings) for the WECA Authorities[1]. In simple terms, the WoE Authorities are going to have to plan for a similar amount of housing to the JSP in a shorter period of time.</p> <p>3.27 This compressed timescale also means that anticipated delivery from large strategic sites over the Plan period will be reduced, especially when one factors in lead in times and applies realistic trajectories to the delivery of housing[2]. The Phase 1 document has raised the importance of ensuring that the final strategy is deliverable and any slips to delivery on identified strategic sites could have serious consequences for the Council in demonstrating a deliverable supply of housing over the longer-term.</p> <p>[1] Albeit the distribution is more heavily weighted toward Bristol.</p> <p>[2] The often cited 'From Start to Finish' report by Lichfields should inform these assumptions.</p> <p>3.28 The potential result is that a greater number of SDLs will need to be identified compared with the JSP to mitigate this risk, with the majority of these delivering housing beyond the end of the Plan period. The Local Plan will, therefore, need to take a longer-term view at this stage in the interests of ensuring the medium-term development needs of the District are met.</p> <p>3.29 We would, therefore, strongly urge the Council to review alternative locations for growth and prioritise those which would require significantly less onerous</p>	

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	<p>infrastructure to facilitate their delivery and more realistically and reliably deliver the housing the Council needs over the Plan period.</p> <p>7. Enable a productive, clean and inclusive economy.</p> <p>3.30 We are generally supportive of this priority and are especially supportive of the need to enhance digital connectivity across the area in light of shifting working patterns as a result of the pandemic.</p> <p>8. Achieving sustainable travel and transport.</p> <p>3.31 Page 47 of the Consultation Document provides a useful summary of travel to work patterns and the level of self-containment (in this context defined by the percentage of people who live and work in the same area) of certain parts of the District. What this illustrates is that not only does the North Fringe of Bristol benefit from high levels of self-containment, but also that it acts as a magnet for the wider South Gloucestershire area with significant levels of in-commuting from Avonmouth, Thornbury, Yate and the Eastern Fringe.</p> <p>3.32 Locating development in close proximity/with good transport access to the Northern Fringe will be important in securing sustainable patterns of travel across the District.</p> <p>3.33 After the Bristol Urban Fringe, we note that Yate also benefits from strong levels of self-containment with 47% of the employed population working locally and relatively modest levels of out commuting to Central Bristol and its urban fringes.</p> <p>3.34 Again, this was another criticism of the proposed SDL at Buckover. Whilst it would benefit from a MetroBus extension and would deliver some employment land on the site, it would still likely have led to significant levels of out commuting to the Bristol North and East Fringes (we note that around 25% of Thornbury residents already travel to Bristol/the Bristol North Fringe to work and this is a settlement which already benefits from a relatively well-established employment base) [3].</p> <p>3.35 Based on the guiding principles set out, we would not expect the Local Plan to pursue Buckover Garden Village given that there are significant sustainability benefits associated with development which is better related to the Bristol Urban Area.</p> <p>9. Ensuring the timely and efficient provision of infrastructure to support growing communities</p> <p>3.36 We support this priority and agree that it is essential that new and growing communities are supported by an appropriate level of infrastructure to maintain and enhance their general sustainability.</p> <p>3.37 The key, as we have touched on above, is ensuring that the scope and need to</p>	

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	<p>deliver this infrastructure does not constrain the timely delivery of housing. This can be achieved through the identification of appropriate and deliverable location for development.</p> <p>[3] See Travel to Work Pattern on Page 47 of Consultation Document.</p>	
<p>EG Carter & Co Limited and Sovereign Housing Association</p>	<p>6. The Priorities:</p> <p>6.1 A total of nine potential priorities are set out covering a range of social, economic, and environmental issues. They have been identified to help shape the content and approaches to the Local Plan and include:</p> <ul style="list-style-type: none"> ? Pursue a Carbon neutral and resilient future in a changing climate; ? Protect and enhance the environment; ? Development that promoted health and well-being; ? Creating exceptional places and spaces; ? Planning for urban and rural areas; ? Provide the right number of new homes; ? Enable a productive, clean and inclusive economy; ? Achieving sustainable travel and transport; and ? Ensuring the timely and efficient provision of infrastructure to support growing communities. <p>6.2 Sovereign Housing and EG Carter support the priorities set out and do not wish to provide detailed comment on what amount to aspirational and worthy objectives. However, it is important that the priorities are consistent with national planning policy. In respect of priority 2, the aspiration to have a balanced approach to employment land across South Gloucestershire should be justified and effective, and in that regard, it should have regard to market evidence and the reality of delivery or long-term viability of protecting sites in employment use.</p>	<p>27 Apr 2021</p>
<p>Ellandi LLP On Behalf of Crestbridge Corporate Trustees Ltd and Crestbridge T...</p>	<p>Infrastructure delivery will be critical to the success of the Yate Improvement Plan including the Yate Town Centre Masterplan. Indeed, infrastructure and connectivity upgrades are key to achieving sustainable growth and attracting a variety of uses so that the town can be enjoyed by the community and visitors both during the day and in to the evening. Consideration will need to be given in respect of transport infrastructure and mobility hubs in support of increased and improved accessibility for visitors and future residents from both the local and wider catchment area. The following is a high-level summary of potential infrastructure needs to support transformation, both for the site and wider context:</p> <ul style="list-style-type: none"> • Alterations to the design of both Station Road and Kennedy Way where they 	<p>05 May 2021</p>

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	<p>adjoin the Town Centre. This would be required to make both streets safer and more attractive to address the barrier created by the existing road. This would be achieved through slower vehicle speeds, new landscape as part of the ‘One Mile Park’ concept and adequate pedestrian and cycle movement lanes.</p> <ul style="list-style-type: none"> • The closure and diversion of the ‘Link Road’ to create a continuous park connection between the Town Centre and Riverside retail and leisure area if the longer-term aspiration to create the ‘Frome Water Meadows’ is to be realised. • The redesign of the roundabout at the junction of Kennedy Way, Station Road and Westerly Road to permit direct access into the Town Centre at this point for buses. • Elements of the public realm, particularly the early phases where the new town square begins to emerge may require forward funding. • The potential re-routing of bus services into the Town Centre itself. • The relocation of bus stops from the existing bus station to the Town Centre or relocation of the bus station, to provide greater convenience and customer experience. • One Public Estate facilities and buildings are assumed as a separate study. The masterplan indicates the potential integration of these services. • Data collection and study regarding utilities. 	
Emma Jarvis	<p>Cannot agree with priorities which meet a document that is unavailable The WECA Spatial Development Strategy. These are obvious, simplistic priorities which are open to a wide range of interpretation.</p> <p>The Bristol and Bath green belt must be reviewed.</p> <p>Priorities 3 and 4 - Consider topography. Walking / cycling neighbourhoods are less effective where there is a noticeable ground incline. Locating development with hills on key routes will discourage this as some find walking and cycling up long inclines difficult. Cycling alongside A roads / motorway relief roads is unpleasant and dangerous, especially for children or new cyclists.</p> <p>Priority 9 - Less weight should be given to developments which are remote from the urban centres and heavily rely on new bus or train infrastructure (and multiple connections) to be sustainably viable. A range of public transport options e.g. bus, train, tram, which are accessible by foot should be offered to large development locations.</p>	28 Feb 2021
Estrans Ltd	<p>Estrans support the nine priorities set out in the document. However, it is recognised that the priorities will need to achieve balance and that not all priorities can be all in every case. For example, the focus on Brownfield sites in urban areas is appropriate but this does not mean that there is no requirement for development in more rural settlements to deliver sustainable patterns of growth and to maintain vitality of those areas.</p>	04 May 2021

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F. Francis	<p>See attached representations.</p> <p>Priorities (Question 4 and 5):</p> <p>At this stage in the Local Plan process the broad priorities outlined identify the key areas where there is a requirement to focus policy and strategy implementation. Identifying such priorities is useful to ensure that future policies and strategies developed around these when formulating more detailed areas of the Local Plan document.</p> <p>Priority 6 should be clear that the objective is to embrace growth and significantly boost housing supply, in accordance with NPPF paragraph 59. The objective of meeting identified needs should be expressed as a minimum and recognising the potential across the District to meet regional needs where necessary should also be identified as a priority. Furthermore, it should be a priority that the Local Plan ensures this housing supply is boosted and can begin delivering immediately, allocating available and achievable land whilst learning from the experience of the current Core Strategy, as discussed above and outlined in Issue no. 32.</p> <p>It is acknowledged that Priority 6 identifies the requirement to ‘provide a portfolio of sites, of different sizes, in a range of sustainable locations across South Gloucestershire’ (Page 57). It is supported that the Spatial Strategy is underpinned by focusing development at ‘accessible’ locations that are well related to existing urban areas, served by existing sustainable transport routes, or with the ‘potential’ to be sustainable as a result of the ‘type and form’ of development proposed. This should be achieved through a detailed review of the Green Belt and an assessment of the most sustainable rural settlements, which hold a number of the characteristics required to achieve sustainable development.</p> <p>Such a review would lead to achieving more sustainable patterns of development across the District in accordance with the South Gloucestershire Council’s Climate Emergency declaration.</p>	26 Apr 2021
Fiona Milden - Vistry Homes Limited	<p>Potential Priority 1 (PP1) to “Pursue a Carbon Neutral and Resilient Future in a Changing Climate” is not sufficiently ambitious and challenging to achieve local and national targets for Carbon reduction. The PP1 should make reference to the target reductions in Carbon emissions required to achieve Carbon neutral and the target date for achieving a District-wide Carbon neutral economy.</p>	09 Mar 2021
Gareth Jackson - Alder King	<p>We broadly agree with the range of Potential Priorities which are set out in the consultation document and which will be presented in further detail as part of the next stage of consultation.</p> <p>Priority 1:</p> <p>We agree with the priority of pursuing a Carbon neutral and resilient future and the role that new development can play in this but consideration must also be given to the ever improving take up of electric vehicle ownership and home deliveries which place less pressure on private car use and the potential to greatly improve air quality.</p>	19 Mar 2021

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	<p>As announced in November 2020, the UK Government has taken a big step to ending its contribution to Climate Change while boosting jobs in the process, as the Prime Minister, Transport Secretary, and Business Secretary announced the end of the sale of new petrol and diesel cars in the UK by 2030.</p> <p>Priority 2:</p> <p>We agree that the environment needs to be protected and enhanced where appropriate but recognition is needed that development can enhance the character and quality of local landscape and improve Biodiversity.</p> <p>Further, through the preparation of Landscape and Visual Assessments, key landscape areas, views and local features which can make a significant contribution to the character, distinctiveness and quality of an area, can continue to be protected.</p> <p>Priority 8:</p> <p>We agree that sustainable travel and transport needs to be a key priority but would refer back to our earlier comments in that in many cases, particularly in rural areas it will be difficult to locate growth in close proximity to existing or new key services and facilities, to create walkable and cycleable neighbourhoods.</p> <p>Recognition must therefore be given to the role that development can play in these locations where increased development can in turn result in new key services and better Public Transport connections.</p>	
Gary Parsons - Sport England	<p>Active Environments - Dedicated sport and leisure facilities need to be co-created, well-designed, supported and maintained to benefit the local community and their users.</p> <p>Good design can help to increase activity levels by encouraging walking and cycling.</p> <p>OUR AMBITION.</p> <p>We want to make the choice to be active easier and more appealing for everyone, whether that's how we choose to move around our local neighbourhood or a dedicated facility for a sport or activity.</p> <p>We also have a contribution to make to tackling climate change by influencing how people live and travel, and through the sustainable planning and design of the nation's sport and leisure facilities.</p> <p>Protecting and improving the nation's sport and leisure facilities by using our investment and expertise to revive places to play, and to innovate new designs and operational models which are community-focused, environmentally sound, financially sustainable and contribute to reducing inequalities.</p> <p>Creating opportunities around community spaces by inspiring local communities to influence owners or increase their own capability to use and sustain these spaces</p>	11 Feb 2021

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	<p>themselves, through advice, training and resources.</p> <p>Helping to create better places to live by influencing those who develop and manage local environments to encourage both formal and informal activity close to where we live, maximising the potential of green spaces and walking and cycling.</p> <p>The implications of climate change. The sport and leisure sector must play its part, so we'll adapt our expertise, guidance, tools and support to help our partners rise to the challenge.</p>	
Gerrit Rollema	<p>If everything is a priority then nothing is a priority. So having too many priorities is pointless.</p> <p>Typical issues today are complete lack of vision regarding infrastructure: In Thornbury, 800 (and counting) new houses were built but no additional roads, busses, schools, shops, nothing. No cycle paths, no (or very) few pedestrian walk ways to connect the new neighborhoods to existing town. In the new development houses are built very close to each other, who really want's to live there? 800 new houses, 1500 new cars on the road as there is no alternative! all standing in the same traffic jam on the A38 towards Bristol in the morning - There is no update to the J14 until 2029!!! All this talk about future priorities is nonsensical if we can't even address our current issues.</p>	10 Dec 2020
Hannah Saunders - Dodington Parish Council	<p>Page 55 – PRIORITIES:</p> <p>Members would agree with the 9 priorities that have been set out to address the themes/issues discussed.... and won't duplicate comments here.</p>	25 May 2021
Hannick Homes	<p>Many Local Plans list priorities but these are seldom carried through into a robust Local Plan which sets out clear policies and proposals for the 20 year period. It is extremely easy to provide a list of priorities but the important part for the Plan is that it is robust, can respond to potential changes during the Plan period and ultimately delivers the necessary level of development both housing and employment.</p> <p>Unfortunately, this has not happened previously in the District and lessons need to be learned and mistakes of the past avoided.</p>	25 Mar 2021
Heather Elgar - Woodland Trust	<p>We welcome the strong priorities for nature recovery and climate action, and for a green recovery.</p> <p>As above we suggest pursuing a 'net gain' in natural carbon on development sites alongside requirements for zero carbon, energy-efficient building design.</p> <p>Final point under 2) Protect and enhance our environment: We suggest amending to 'Protect and enhance the character, distinctiveness, quality and intrinsic features of the local landscape, including irreplaceable habitats'.</p>	12 Feb 2021
Helen Johnstone - Stroud District Council	<p>Pursue a carbon neutral and resilient future in a changing climate – SDC support as a response to delivering the overarching target for South Gloucestershire to be carbon neutral by 2030.</p> <p>Provide the right type and number of new homes - SDC support the allocation of</p>	26 Feb 2021

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	<p>sites to meet the identified need in the West of England Spatial Development Strategy</p> <p>Achieving sustainable travel and transport – SDC support the principle of new growth in proximity to existing or new key services and facilities including effective public transport connections and facilitated walking, cycling and public transport</p> <p>Ensuring the timely and efficient provision of infrastructure to support growing communities – SDC support the principles of new growth well served or capable of being well served by infrastructure and the alignment of the delivery of all development with the provision of necessary infrastructure</p>	
Housley	While I agree with the potential priorities, there is no effort to address them in plans - provision of viable public transport to enable commuting for work or domestic necessities. As a result of this and general lack of planning cohesion, the ability for the council to meet the carbon neutral and protect and enhance our environment priorities have no actions in place to enable them	19 Feb 2021
Ian Leslie	The priorities should include only re development of existing urban settlements and eliminate expansion as satellites into the greenbelt areas. The whole concept is based on the premise that in order to survive as a Council, more development is necessary to create more jobs and bring in more people which means the Council has to provide more homes and the never ending cycle continues. This totally contradicts the other part of the strategy in that the Council wishes to protect the environment, look after wildlife , create a healthier environment, have a positive impact on climate change etc, all the primary goals of the plan. All the marvellous things that are planned to protect the planet disappear under these plans. It is my opinion that lip service is given to conservation of the planet whilst the real aim is to create a larger revenue stream for the Council , none of which will ever be seen by the current residents. Transparency does not seem to be on the list of priorities.	28 Feb 2021
Ian Tibbert	Transport has to be top , another station improved buses and a more reasonable cost. We are poorly supported compared to bristol	27 Nov 2020
IM Land	<p>23. Yes, however as explained above, they need to be explicitly inclusive of emerging travel modes and needs and to recognise that these will be enabled by a different approach to the Spatial Strategy.</p> <p>24. In addition to this, there is little mention of the need to align the Plan with strategies and plans being pursued by neighbouring Authorities, in particular Bristol, or of the cross boundary working that is essential to creating a sustainable and Carbon efficient South Gloucestershire. IM therefore suggest the Plan includes a cross boundary priority and sets out the Council’s key objectives for this.</p>	11 May 2021
IM Land Limited	<p>Please see enclosed submission.</p> <p>4.0 POTENTIAL PRIORITIES:</p> <p>QUESTIONS 4 & 5:</p> <p>4.1 Within the scope of these representations, we support the identification of</p>	26 Mar 2021

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	<p>potential priorities within the consultation document. Seeking to achieve the potential priorities should promote sustainable patterns of development over the Plan period. For example, in order to pursue a Carbon resilient future and in accordance with South Gloucestershire Council's Climate Emergency declaration the Local Plan 2020 should look to direct growth to areas which are inherently connected to existing settlements in proximity to strategic employment facilities, well served by sustainable transport infrastructure and provide opportunities to maximising the use of both Public Transport and active travel routes. Prioritising growth in areas which benefit from such principles will inevitably help the Local Authority achieve a better balance between future employment and residential requirements, reduce the need and reliance on private transport to commute further afield whilst encouraging more active forms of transport thereby reducing Carbon emission through healthier lifestyle choices.</p>	
Ivywell Capital (IC)	<ul style="list-style-type: none"> • The decarbonisation of transport will be an important factor in achieving these goals and so it is critical that new development is located in areas with good access to services, facilities, jobs and Public Transport connections. <ol style="list-style-type: none"> 1. Pursue a Carbon neutral and resilient future in a changing climate. <p>3.2 Climate Change is rightly identified as a key issue that the Local Plan should seek to address and we are supportive of the Council's ambitions to achieve Carbon neutrality by 2030.</p> <p>3.3 With regard to Housing Delivery, we agree that it is important for new development to support the de-carbonisation of transport to minimise usage of the private motor vehicle and maximise opportunities for walking and cycling. It will be imperative to locate development where access to existing or new services, facilities, employment opportunities and Public Transport are/will be strong.</p> <p>3.4 Furthermore, the advent of electric vehicles and increased levels of home-working are not reasons that would justify a departure from this approach. This is because there are significant economic and social benefits to ensuring that people can access the services, facilities and jobs through a variety of means.</p> <p>3.5 However, one also needs to be realistic in acknowledging individual travel patterns and behaviours will still mean additional vehicular journeys will be required. This can be mitigated by ensuring that where vehicular journeys will be made, the relative distance required to access services, facilities and employment opportunities are minimised. This would, naturally, support development at existing key settlements and areas with good access to the Bristol Urban Fringe (e.g. Tockington).</p> <p>3.6 That said, maximising the potential for sustainable patterns of development will only go so far. A significant contributor to emissions is energy consumption within individual dwellings and, as a result, we also support a requirement for higher energy efficiency standards to minimise energy demand. We note that the Government has now withdrawn its intention to restrict Councils' ability to set higher energy performance standards than those prescribed in the Building Regulations. As such, we would support an approach which sought to achieve a</p>	17 May 2021

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	<p>higher standard than would otherwise be imposed at a national level.</p> <p>3.7 Furthermore, the Government are still pursuing their Future Homes Standard which will require all new homes to be highly efficient with low Carbon heating and zero Carbon ready by 2025. Requiring all new homes to be Carbon neutral upon the Plan's adoption would not be such a significant step up from what will, ultimately, be the status quo moving forward and so we would support this approach.</p> <p>2. Protect and enhance our environment.</p> <p>3.8 The Environment is the next identified theme and, again, we are entirely supportive of the need to ensure that development leads to a betterment of the District's Biodiversity and Green Infrastructure assets and should seek to exceed identified standards where possible.</p> <p>3. Development that promotes health and well-being.</p> <p>3.9 Again, we are generally supportive of this priority and are committed to ensuring that high-quality open space and access to active/Public Transport routes/connections are provided.</p> <p>4. Creating exceptional places and spaces.</p> <p>3.10 All development should aspire to secure the highest standards of urban design and so we fully support the need for areas of growth to be legible, walkable and beautiful places to work, live and play.</p> <p>5. Planning for urban and rural areas.</p> <p>3.11 Naturally, we support any attempts to maximise the development potential within existing urban and rural settlements. However, we also welcome the acknowledgment that this will only go so far in meeting overall housing needs and that greenfield (whether in or beyond the Green Belt) sites will be needed to meet the development needs of the District and other WECA members. We would note that this conclusion is also reached by the Sustainability Appraisal (SA).</p> <p>3.12 For reasons set out later in this document, we consider exceptional circumstances will exist to justify the removal of land from the Green Belt to support the Council's development needs. Where this is necessary, we wholeheartedly support the need to ensure that new boundaries are robust and defensible to improve its important function of restricting further urban sprawl.</p> <p>3.13 We would note that the SA indicates that there will likely be significant sustainability benefits associated with the release of Green Belt land for both strategic and non-strategic levels of development and that this should be explored through the Local Plan process.</p> <p>6. Provide the right type and number of new homes.</p>	

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	<p>3.14 We await the progression of the West of England SDS for further details on the housing requirement that will ultimately be adopted. The only thing we would note is that the Standard Method yields a slightly higher minimum annual requirement than the adopted Core Strategy (1,360 vs 1,412 dwellings per annum).</p> <p>3.15 We are also mindful that there has been a significant increase to Bristol's need following the revisions to the Standard Method (which has added around 830 dwellings to their annual requirement). Given the limited availability of land within Bristol's administrative boundary, it is unlikely that it will be able to meet its previously predicted need, let alone this increased minimum requirement itself.</p> <p>3.16 Furthermore, constraints around Bath will likely limit the scope for it to accommodate some of Bristol's unmet need and so the onus will be on South Gloucestershire (and potentially North Somerset) to assist in meeting Bristol's unmet needs. As such, we would expect South Gloucestershire's minimum housing requirement be uplifted significantly from the standard method figure to account for this.</p> <p>3.17 It will be important for progress to be made on the SDS and to reach a joint position with North Somerset in order to understand how housing will need to be distributed across the region and allow for effective and viable options to be considered.</p> <p>3.18 We welcome the acknowledgment of the difficulties the Council has had with delivery in recent years and we would stress that the deliverability of any strategy should be a central guiding principle for the Plan. Large strategic sites will be essential to securing the overall housing requirement; however, they tend to have long lead in times, can have various complexities and often need to secure enabling infrastructure in advance of their delivery which also leads to the affordable housing provision being significantly below the adopted policy position.</p> <p>3.19 The Council has had first-hand experience of this in recent years with delays to the Cribbs Patchway and East of Harry Stoke New Neighbourhoods being a key reason for their deficient housing land supply position in recent years. This has facilitated significant levels of speculative development at sites beyond the Green Belt and placed significant pressure on rural communities to make up the shortfall. Such development is not necessarily unsustainable, but it sits outside of the adopted Plan's overarching development framework which would otherwise secure a more socially, environmentally and economically sustainable outcome.</p> <p>3.20 Consequently, it is imperative that the Council identify Strategic Development Locations with deliverability at the forefront of any considerations. Development locations that would require significant upfront enabling infrastructure should be carefully considered against alternative locations with less onerous requirements.</p> <p>3.21 Furthermore, the Council needs to ensure that there is an appropriate balance between strategic sites and non-strategic sites to underpin delivery, particularly in the early years of the Plan period. An over-reliance on strategic sites increases the</p>	

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	<p>risk that housing may not come forward in a timely manner and speculative Planning Applications will be required to make up the shortfall in the context of a deficient housing land supply position. This is something the Council has stated it wishes to avoid.</p> <p>3.22 Non-strategic growth will, therefore, have an important role to play in mitigating potential risks associated with delivery on strategic sites, especially in the early years of the Plan period whilst the latter make their way through the development control process.</p> <p>3.23 Another important factor to consider is the relatively compressed timescale for the Local Plan and how this will affect the delivery of housing. The new Local Plan will cover a period of 15 years which is five years less than the JSP; however, the housing requirement has remained around the same level (c. 80,000 dwellings) for the WECA Authorities[1]. In simple terms, the WoE Authorities are going to have to plan for a similar amount of housing to the JSP in a shorter period of time.</p> <p>3.24 This compressed timescale also means that anticipated delivery from large strategic sites over the Plan period will be reduced, especially when one factors in lead in times and applies realistic trajectories to the delivery of housing[2]. The Phase 1 document has raised the importance of ensuring that the final strategy is deliverable and any slips to delivery on identified strategic sites could have serious consequences for the Council in demonstrating a deliverable supply of housing over the longer-term.</p> <p>3.25 The potential result is that a greater number of SDLs will need to be identified compared with the JSP to mitigate this risk, with the majority of these delivering housing beyond the end of the Plan period. The Local Plan will, therefore, need to take a longer-term view at this stage in the interests of ensuring the medium-term development needs of the District are met.</p> <p>3.26 We would, therefore, strongly urge the Council to review alternative locations for growth and prioritise those which would require significantly less onerous infrastructure to facilitate their delivery and more realistically and reliably deliver the housing the Council needs over the Plan period.</p> <p>3.27 This strategy should also be supplemented by an appropriate level of growth at the rural villages. Development at these villages is often required to ensure their vitality and viability is maintained and to ensure that important services (shops, GP Surgeries, Schools etc) are maintained. The Green Belt constraint at a number of rural villages has limited the scope for development to come forward in recent Decades and this has placed a disproportionate amount of pressure on non-Green Belt settlements (e.g. Falfield and Wickwar).</p> <p>[1] Albeit the distribution is more heavily weighted toward Bristol.</p> <p>[2] The often cited 'From Start to Finish' report by Lichfields should inform these assumptions.</p>	

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	<p>3.28 It is also important to ensure the populations in these villages remain balanced in the interests of supporting their vitality and viability. The lack of starter homes or opportunities for downsizing in these villages mean that young people tend to move out and older people continue to occupy housing that would be more suitable for young and/or established families. Shifting demographics mean that Schools need to extend their catchments due to the need to ensure a sufficient roll of pupils can be retained to justify the School's continued operation. This is certainly the case in Olveston/Tockington where the local Primary School has had to boost its numbers by taking in students from further afield.</p> <p>3.29 This is not, however, sustainable over the longer term as there are social and environmental benefits associated with children going to School close to home (closer to friends, reduced use of private motor vehicle etc). Facilitating development within these villages can help to address this imbalance.</p> <p>3.30 Furthermore, the majority of the Green Belt villages are located in close proximity to important settlements or the Bristol Urban fringe. This makes them generally more sustainable locations for growth than their non-Green Belt counterparts.</p> <p>3.31 Appropriate levels of growth at both Green Belt and non-Green Belt villages can help to underpin housing delivery, particularly in the early periods of the Plan period as larger strategic sites navigate their way through the planning process.</p> <p>7. Enable a productive, clean and inclusive economy.</p> <p>3.32 We are generally supportive of this priority and are especially supportive of the need to enhance digital connectivity across the area in light of shifting working patterns as a result of the pandemic.</p> <p>8. Achieving sustainable travel and transport.</p> <p>3.33 Page 47 of the Consultation Document provides a useful summary of travel to work patterns and the level of self-containment (in this context defined by the percentage of people who live and work in the same area) of certain parts of the District. What this illustrates is that not only does the North Fringe of Bristol benefit from high levels of self-containment, but also that it acts as a magnet for the wider South Gloucestershire area with significant levels of in-commuting from Avonmouth, Thornbury, Yate and the Eastern Fringe.</p> <p>3.34 Locating development in close proximity/with good transport access to the Northern Fringe will be important in securing the most sustainable patterns of travel across the District.</p> <p>9. Ensuring the timely and efficient provision of infrastructure to support growing communities.</p> <p>3.35 We support this priority and agree that it is essential that new and growing communities are supported by an appropriate level of infrastructure to maintain and</p>	

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	<p>enhance their general sustainability.</p> <p>3.36 The key, as we have touched on above, is ensuring that the scope and need to deliver this infrastructure does not constrain the timely delivery of housing. This can be achieved through the identification of appropriate and deliverable SDLs, which are underpinned by an appropriate level of non-strategic growth at the rural villages.</p>	
Jack Turner - Patchway Town Council	No.	17 Feb 2021
Jack Turner - Tormarton Parish Council	<p>5. Tormarton Parish Council – Creating Sustainable Rural Villages and Settlements We have focussed our response on the section of the Consultation that is most relevant to the two villages of Tormarton and West Littleton – Creating Sustainable Rural Villages and Settlements – and comments are as follows:</p> <p>5.1 Growth Firstly, we support your proposed approach to investigate an appropriate level of growth within our rural villages and settlements. We understand and support the importance of creating sustainable villages. We want our villages to thrive and be enjoyed by a wide-range of residents – existing local families, those relocating from other parts of the UK, youngsters, adults, senior citizens – all coming together to form a supportive and positive community. Both villages are in easy commutable distances to both large cities like Bristol and Bath and to the small/medium sized towns like Yate and Chipping Sodbury as well as Chippenham in Wiltshire. In terms of growth and development, we support SGC’s recommendation that this should be strategically planned rather than speculative and that targeted rural villages could be identified for small and medium development, ie. 5 houses plus. However, with limited amenities, it is difficult to imagine anything but minimal growth in our two villages. The consultation states that future planning for growth will be done ‘working with our communities’ and we feel this is essential to ensure any growth is viewed positively within our communities, is sympathetic and is appropriate. We would like to know how SGC propose to involve our communities in these decisions going forward. Neither Tormarton or West Littleton meet the minimum criteria for transport links as confirmed in the Data and Access Profiles. West Littleton is totally reliant on car transport to reach any amenities which are 2 miles away, and Tormarton similarly suffers with poor access to amenities (although there is a very limited bus services from Tormarton). There are no designated walking or cycling routes from the villages to neighbouring villages/towns, although such routes would be supported by the Parish Council, particularly safe cycling routes which would also ease travelling times. Similarly, a greatly improved public transport service would provide improved access to our more urban areas and reduce reliance on less sustainable methods of transport.</p> <p>5.2 Environment The villages sit in a rural community where farming and associated agricultural</p>	24 Feb 2021

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	<p>services form the main economy.</p> <p>Both our villages sit within the Cotswold Area of Outstanding Natural Beauty and are designated Conservation areas. West Littleton is also designated a Site of National Conservation Interest. Our villages are enjoyed by thousands of visitors every year, many of whom are walking the Cotswold Way which runs through or close to the two villages and provide an accessible rural ideal that is so important for health and wellbeing. This has been emphasized even more during the current Covid restrictions, where we have noticed numbers of visitors have increased dramatically.</p> <p>There are currently 2 sites of designated Green Spaces in Tormarton with 5 more sites nominated in the Policies, Sites and Places Plan adopted in November 2017. The Common in West Littleton is also a nominated site. To protect and enhance our environment, we urge SGC to recognise and nominate these remaining Green Spaces in the Local Plan.</p> <p>5.3 Travel and Transport</p> <p>This has been covered under ‘Growth’ above. There are currently extremely limited sustainable transport options in our two villages. A series of safe cycling routes for both adults commuting and children travelling to schools in Acton Turville and Marshfield would be welcomed. Similarly, a review of bus services through the villages.</p> <p>It is worth noting that a number of residents within Tormarton take advantage of the Green Community Transport initiative.</p> <p>Adequate road maintenance is essential, particularly through the winter months.</p> <p>5.4 Infrastructure</p> <p>Tormarton and West Littleton have in recent years been connected to fast fibre broadband which has made a significant improvement to communications generally and, in particular, for home-working and schooling. It is essential that these technology updates continue to ensure our communities can compete with more urban areas.</p> <p>Tormarton and West Littleton children are served by Acton Turville and Marshfield Primary Schools – both schools are just over 2 miles away from the villages, but with no public transport to service them. As both schools are over 2 miles away from our villages, there is no automatic link to either school which means our children are just allocated spaces based on availability and children within the same family have been known to be split between different schools.</p> <p>There is no mains gas connected to either village, so residents are dependent on oil, lpg or electricity. Similarly, there is no mains sewage connection in West Littleton.</p> <p>Thank you for giving us the opportunity to respond to Phase 1.</p>	
James Carpenter - Falfield Parish Council	<p>These are very generalised obvious priorities that do not have equal weight, and their vagueness is still open to a variety of interpretations. The WECA SDS is unavailable so cannot agree.</p> <p>Priorities 3 & 4 also need to consider topography, encouraging walking and cycling is good but locating development where there are hills on key routes will discourage this. Some adults and most children find cycling up long inclines hard.</p>	14 Apr 2021

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	<p>Also cycling alongside busy roads e.g. A roads is unpleasant and dangerous, should not be relied on as mitigation.</p> <p>Priority 5. Not 'if 'Green Belt reviewed, replace with 'the Green Belt must be reviewed.'</p> <p>Priority 6. As indicated the wording of this issue is likely to be superseded by the Government's consultation outcome paper to local housing need proposals dated 16th December 2020. We understand that a greater concentration of new dwellings will need to be delivered within the Bristol urban area itself and not outsourced to outlying areas. It also says the Duty to Co-operate is being removed. Providing homes for other areas is contrary to the climate emergency as this will simply increase Carbon footprint for the need to travel for work. Housing numbers MUST be reallocated to align to where the jobs and housing demand exists. Housing allocations should change significantly given dropping the need for co-operation and the need to meet the climate emergency.</p> <p>Priority 9. Timely infrastructure that can be delivered within the Plan period. Add a range of Public Transport types is preferable to one, e.g. bus and train.</p>	
James Durant - Cotswold Homes	<p>Cotswold Homes are fully supportive of the priorities highlighted by the Council for the Plan period and are acutely aware that a number of the priorities are interlinked and fundamental to achieving Priority 4 in relation to creating exceptional places and spaces. Achieving Carbon neutrality and resilient future homes as specified under Priority 1 is of course highly dependent on the quality of the individual buildings proposed as part of any scheme, but it is pleasing to note that the Council recognise that the Carbon footprint of buildings means nothing without the greater context of the need for high quality places being created as part of the wider scheme as well as the careful consideration of the location of the site. A new Local Plan provides an opportunity for the Council to improve the poor sustainability which has arisen from the speculative, piecemeal development that has come forward over previous years, through a Plan led assessment and allocation of schemes which can deliver community benefits and infrastructure which is missing from areas which have seen large levels of speculative development.</p> <p>For the reasons set under our answer to the above question relating to Issues, Cotswold Homes are also fully supportive of Priority 6 which seeks to provide the right type and number of new homes. We re-iterate the importance of the allocation of smaller sites rather than relying on windfalls and rather than relying simply on large scale allocations to deliver the housing targets. As recognised by the Council, smaller sites help with the 5 year supply of housing land and the overall delivery of housing; Cotswold Homes have a proven track record of quick delivery of the schemes we have brought forward and this is something we will continue to do over the Plan period. Whilst the Council have noted that growth is required at smaller villages to help ensure the vitality of local services and facilities, it should also be noted that the lack of growth at settlements exacerbates affordability issues at those settlements and does not allow for the existing or future affordable housing needs to be met.</p> <p>For example, ONS data demonstrates that as of June 2020, the median house price</p>	19 Apr 2021

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	<p>paid in England was £246,000, in South Gloucestershire was £278,000 but in rural areas such as the Frampton Cotterell Ward (which includes settlements such as Frampton Cotterell, Rangeworthy, Tytherington, Latteridge, Iron Acton, Engine Common and Coalpit Heath), the median price paid was £390,000; 40% higher than the South Gloucestershire average.</p> <p>The data also shows that whilst median house prices in South Gloucestershire have increased by 46%, in rural Wards such as Chipping Sodbury and Cotswold Edge (which includes rural settlements such as Wickwar, Acton Turville, Old Sodbury and Hawkesbury Upton), house prices have increased by 55%.</p> <p>Couple this with the data from the Council's housing register waiting list which shows that for example as of 1st April 2020 there were 16 households who were accepted as being in need of affordable housing and had specified a need for an affordable home in Wickwar, it is abundantly evident that without growth at the villages neither the affordability issues or the affordable housing needs are likely to be resolved and the social aspect of sustainability will not be achieved.</p> <p>With a track record of delivering high quality, policy compliant schemes in a timely fashion in rural settlements, Cotswold Homes are ideally placed to help the Council achieve the rural dispersal part of the housing strategy and would urge the Council to give serious consideration to the allocation of our sites put forward as well as working with us on identifying locations for future growth for us to focus our activities on.</p>	
Jenny Raggett - Trasnport for New Homes	<p>Although there are many fine words about sustainability and environment, the missing piece of the puzzle - an essential piece - is European style integrated transport. The priority is the careful selection of sites and their early masterplanning in conjunction with the provision of sustainable modes including public transport. It also means 'mixed development' where shops, services and leisure is at a human scale and integrated into the street network, rather than on the fringe of a new estate on a ring road, link road or roundabout. That way people can really walk. If you consider for example, the shopping centre at Yate, the language of the area is 'come by car' and the sheer quantity of parking shows that this is expected. The same is so for a number of employment areas on the Bristol fringe. So a different approach is needed with firm and aspirational policy backing.</p>	01 Mar 2021
John Acton	<p>I am not sure about the priorities. Again there are a lot of them and they are not equal. There is not enough about the adverse effects of road traffic in environmental, safety and economic terms.</p>	26 Mar 2021
John Brimacombe	<ol style="list-style-type: none"> 1. Future developments should be carbon negative. 2. Homes should be able to adapt to future changes in demographics. 	28 Feb 2021
John Calver	<p>The major priority should be Climate Change and The Environment . I would include in this sustainability : can the population walk /cycle to shops and employment within 30 mins. Within Environment building on the Flood Plain must be out of the question , even if development has suitable measures put in place , problems can be caused elsewhere.</p> <p>Greenbelt in itself is an outdated concept , but the spirit of the policy should be incorporated</p>	04 Feb 2021

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John Mills - Cotswolds Conservation Board	<p>The Cotswolds Conservation Board broadly agrees with the potential priorities identified in the consultation document. However, we are disappointed that the Cotswolds National Landscape is not explicitly addressed as a priority. In particular, we are disappointed that the consultation document does not prioritise a landscape-led approach to development in the Cotswolds National Landscape and its setting. Further comments on this issue are provided below.</p> <p>We have provided comments on other relevant, specific priorities (such as renewable energy) in other sections of this consultation response.</p> <p>Landscape-led approach in the Cotswolds National Landscape and its setting</p> <p>Almost a quarter of South Gloucestershire lies within the Cotswolds National Landscape. In addition, a large area of South Gloucestershire is in the setting of the Cotswolds National Landscape (i.e. located outside the National Landscape but where development could still potentially have an adverse impact on the National Landscape).</p> <p>The statutory purpose of designation for the National Landscape is to conserve and enhance the natural beauty of the Cotswolds National Landscape. Development within the Cotswolds National Landscape and its setting should, therefore, be required to be compatible with - and positively contribute to – this purpose, with this requirement being considered from project inception. This is a ‘landscape-led’ approach to development.</p> <p>Further information and recommendations on this landscape-led approach is provided in the Board’s draft Position Statement on Planning and Development, which the local authorities have recently been consulted on.</p> <p>We recommend that the South Gloucestershire Local Plan should explicitly identify this ‘landscape-led’ approach as a priority for the Cotswolds National Landscape and its setting. This would be consistent with the landscape-led approach that is taken in Local Plan documents for other protected landscapes, including the South Downs National Park and the Arnside and Silverdale AONB.</p> <p>Explicitly advocating this landscape-led approach in the Local Plan is particularly important given that the Government-commissioned ‘Landscapes Review Final Report’ (sometimes referred to as the ‘Glover Review’) has proposed a strengthened place for national landscapes in the planning system.</p> <p>Further guidance on this landscape-led approach, including the exceptional circumstances that might apply, is provided in response to Question 16.</p>	16 Mar 2021
Jo Marsh	<p>Planning for new homes needs to be carefully considered. An impact or reduction on green belt land should be an absolute last resort. Green belt land is essential to welfare and wellbeing and should be protected. In addition to this, additional traffic has an impact on road conditions and an environmental impact.</p>	11 Feb 2021
Jonathan Edwardes -	<p>Q4 - Yes (but we would not wish to put them in any order)</p>	26 Feb 2021

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Pilning and Severn Beach Parish Council	<p>Q5 - A precursor to all priorities in plan making should be to agree that no one group has all the answers, and that politics (and especially Politics) should be left at the door.</p> <p>1) Conserving designated sites, support needs to be provided to owners of designated sites. Council to be a conduit to technical help and sources of financial assistance.</p> <p>2) We see that WECA now has a ‘Nature Partnership’. That must work with (and not in competition with) Forest of Avon Community Forest and Avon Wildlife Trust.</p> <p>3) The Severn Estuary is a leisure attraction which has become increasingly important over the last year, creating an increased demand for public transport access to the area, intense pressure on car-parking, public toilets and litter bins.</p> <p>4) Proximity to two motorways and growing industry are having an impact on the air quality of our area.</p> <p>5) Flood Risk. We welcome the improvements to the sea defences, work in progress. But we wish to have re-assurances from higher authority that the defences will continue to be maintained to a high standard, until a comprehensive plan is made for the re-location of all residents.</p> <p>6) This is an opportunity to consider changes to the Green Belt designation. The Parish Council believes that the Green Belt should be extended to the boundary of the Severnside Enterprise Area. This is necessary to preclude the ad-hoc encroachment by development, already demonstrated, which the LPA is ill-equipped to stop by means of “other policies”.</p> <p>7) We wish to see appropriate growth within our villages permitted, on an ‘infill/ replacement/previously developed basis.</p> <p>8) We welcome the proposal for a Local Housing Needs Assessment to inform any development proposals.</p> <p>We fully support the principle of ‘duty to cooperate’ and hope that this, together with ‘working in partnership’ and ‘localism’ will be explained to all departments of the council.</p> <p>9) We support the need for provision of more properties equipped to meet the needs of the elderly and disabled, as we predict that an LHNA will demonstrate an unmet need in this area.</p> <p>10) Challenge for High Streets: part one is what to do with vacant retail premises; part two is what to do with the excess parking demands of converting retail to residential multiples and not requiring appropriate parking provision.</p> <p>11) Safeguarding land for employment must be considered alongside transport</p>	

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	<p>needs of the workers and their needs to get to work at shift times. Shift times must be reflected in bus and train times.</p> <p>12) Travel to Work map obliterates Pilning Station, which will be part of the solution for Severnside. It also omits an arrow for the significant numbers of workers who cross the river from Chepstow and the Forest of Dean area. The numbers crossing the river were anticipated to increase by 25% pre-covid.</p> <p>13) The Joint Local Transport Plan (JLTP) is too ‘top-down’ and this needs to be reversed.</p> <p>14) Renewables: Councils must lead the way in installing renewables but financial assistance and reliable technical support is needed. A quick tally of schools and village halls will show the vast area available, which could be incorporated into a South Glos Energy Project. The Council needs to be ambitious.</p>	
Kate Kelliher	See my earlier comments wrt horse riding, running and dog walking. These activities are important for families.	31 Jan 2021
Kate Kelliher - Friends of Ram Hill Colliery	From where we are located next to the railway track at Ram Hill, we see many passers by taking part in leisure activities. We note with concern that horse riding, running and dog walking do not appear in the plan. We see many local people doing all of these and provision must be made for these 3 significant activities to continue round here in the new South Gloucestershire.	06 Feb 2021
Katherine Buff	<ul style="list-style-type: none"> • The 9 priorities listed are mostly valid, but not of equal weight. If these priorities are to be used as criteria for selecting candidate locations for development, they must be given weighted scores, not used as a simple tick list (or incomprehensible set of symbols as was done during the JSP). In my view the first two priorities (carbon neutrality and environmental protection) are more important than the other seven combined, and we would weight it to around 60% of the total score. Furthermore, within each priority a bullet list of attributes is given, but once again they are far from being of equal value. In my view, for each priority a fundamental criterion should be defined and allocated most of the weighting for that overall priority. For example, without such weighting it would be possible for a greenfield site which is miles from areas of employment and served almost exclusively by the private car to claim ‘green credentials’ because it proposes cycle paths and retains some trees. That does not mean that cycle paths and tree retention is irrelevant, but it should not form the basis for preferring a spatially inappropriate location. Given below are our suggestions for the fundamental criteria for the most important of the priorities: <ul style="list-style-type: none"> o Priority 1 (pursue a carbon neutral future): Proximity to employment or availability of existing (or irrevocably committed) mass transit that can be shown to be the commuter means of choice for that location. o Priority 2 (protect and enhance our environment): Identify and establish protection for <ul style="list-style-type: none"> ▪ Land with designated environment features identified on pages 66 to 71, plus Best Most Versatile Land (grades 1 to 3) ▪ Greenfield areas that are most vulnerable to speculative development Our view is that the next five priorities would be ranked in the following order 	26 Feb 2021

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	<p>(togetherwith suggested fundamental criteria for each):</p> <ul style="list-style-type: none"> o Priority 5 (Planning for urban and rural areas): Prioritise the need to concentrate development on brownfield sites o Priority 8 (achieving sustainable travel and transport): growth should be in close proximity to existing facilities. Sites with the reliance on a private car should be avoided. o Priority 9 (ensuring timely and efficient provision of infrastructure to support growing communities): Infrastructure should not be assumed to support any new development that is not already in place or irrevocably committed. This situation is exacerbated given the Government’s extreme situation on public finances. o Priority 3 (Development that promotes health and well-being): Issue 14 (page 32) concerns accessibility to health services to all, and yet this has not been addressed at all within priority 3 o Priority 4 (creating exceptional spaces): Deploy the ‘15 minute neighbourhood’ policy, or similar, such that all necessary local services are within comfortable walking distance <p>The remaining “priorities” described barely merit mentioning, in our view, and certainly don’t help to direct the choices of where to concentrate new development. Priority 6 (provide the right type and number of new homes) is simply a truism – if this is not achieved then the plan will just be rejected. Priority 7 (Productive, clean, inclusive economy) is just waffle, though the bit about re-thinking town centres could be incorporated into Priority 5.</p>	
Kevin Masters	I have read Trapp'd's response and wish to add my name to it.	25 Feb 2021
Kingdon	Please see information on comment 3.	25 Feb 2021
Lauren Cook - Stride Treglown	UWE Bristol considers that the Council has accurately identified the range of priorities that are essential to appropriately shape the content and approaches in the new Local Plan.	01 Mar 2021
Lee Preece	Updates to references to allowable development in special circumstances (Green belt and AONB and conservation areas) to match Central Planning framework rules and not contradict them causing confusion and stress for all parties, parish councillors, planners and appellants.	03 Feb 2021
Lee Taylor	Would be nice for the community to be involved and have a say on development designs. As above comment blend with surrounding environment and have renewable energy facilities.	23 Jan 2021
Lee Williams - Cleve Rugby Football Club Ltd	<p>Please see attached document.</p> <p>3. Section 4: Potential Priorities:</p> <p>3.1 The Phase 1 consultation document identifies 9 ‘potential priorities’ that it considers could shape the content and approaches in the new Local Plan. It is correctly recognised that these priorities do not operate in isolation, with the</p>	08 Apr 2021

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	<p>potential scope for these priorities to address more than one issue. By way of example, Priority 6 (Provide the right type and number of new homes) has the potential to support all the other priorities where new development is brought forward in locations that are or can be made sustainable.</p> <p>3.2 The Local Plan once adopted will be the ‘growth strategy’ for South Gloucestershire, therefore the identified priorities should be set in the context of facilitating sustainable patterns of development. It should do so in a way that not only addresses issues related to need and the overall quantum of development, but also supports the Plan in wider objectives, such as reducing the need to travel and providing high quality places and healthy lifestyle.</p> <p>3.3 It is noted that the 9 potential priorities are not specifically listed in order of priority/importance which is correct. However, the future growth strategy must respond to identified need, so there is a case to be made that delivering the right type and number of new homes should form the overarching objective. In turn, priorities are achieved as part of a growth strategy that seeks to deliver the correct quantum of development.</p> <p>3.4 We consider each ‘Potential Priority’ in turn.</p> <p>1. Pursue a Carbon neutral and resilient future in a changing climate.</p> <p>3.5 This priority reinforces the national agenda and is supported as a matter of principle. Greater clarity is required in terms of what implications such priorities have on individual development schemes, and also whether the objective of Carbon neutrality is a calculation that is taken overall, rather than a measure of the acceptability of individual growth locations.</p> <p>3.6 Requirements for zero-Carbon and energy efficient design and construction are also supported in principle, so long as the Local Plan is based on detailed considerations of the viability implications. This is considered necessary to ensure that growth requirements can be achieved during the Plan period.</p> <p>3.7 Low-Carbon and renewable energy generation, alongside increasing the resilience to Climate Change, are all important measures that the Local Plan will need to implement in order to respond positively to the declared climate emergency.</p> <p>2. Protect and enhance our environment.</p> <p>3.8 This priority replicates the obligations on Local Planning Authorities as set out in Sections 15 and 16 of the National Planning Policy Framework, therefore as priorities to inform the preparation of the New Local Plan, these are supported in principle.</p> <p>3.9 In achieving this priority, it should be recognised that in specific circumstances, new development can play an important role, through the delivery of improvements and enhancements to existing conditions.</p>	

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	<p>3.10 The Local Plan should avoid circumstances where blanket restrictions on development occur, in doing so ensuring that future locations for growth to meet identified need, are considered on their individual merit and their capacity to successfully respond to their specific circumstances, whilst supporting the overall aspiration of this potential priority.</p> <p>3. Development that promotes health and well-being.</p> <p>3.11 It is embedded within the social objective to sustainable development that health, social and cultural well-being is a function of the planning system. Access to usable and appropriate open/green space, alongside good quality residential amenity is an important component of this priority.</p> <p>3.12 There is no objection to this priority, and as part of the strategy for achieving this, the new Local Plan should recognise that development can ‘promote’ health and wellbeing, by directing growth to locations which are or can be made sustainable, thereby reducing the need to travel and maximising walking and cycling opportunities.</p> <p>3.13 It should also be recognised that development can support existing provision of open spaces, informal and formal sports etc. This is of particular relevance in terms of our promotion of land which currently forms part of the Cleve Rugby Football Club.</p> <p>3.14 Surplus land (c.3.75ha) is being promoted for development and the capital receipts from this will be reinvested into the Rugby Club. The changing nature of user requirements and the justification for releasing surplus land is set out within the Rugby Club Position Statement prepared in support of these representations (Appendix 2).</p> <p>3.15 Those improvements which are sought in order to improve the experience and range of activities are likely to include:</p> <ul style="list-style-type: none"> ? Modernisation of existing building to improve energy efficiency and make more efficient use of existing space. ? Improve spectator experience and hospitality facilities. ? Diversification of activities, to include multi-sport facilities and expansion of existing mini and ladies football activities. ? All weather sports pitch. ? Community use sports equipment. ? Changing room facilities. <p>3.16 Alongside these ambitions for the Rugby Club, the Covid-19 pandemic has a</p>	

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	<p>profound impact, in terms of levels of participation and revenue. Set alongside the general changes in the nature of users requirements and expectations, there is an urgent need for modernisation so that the Rugby Club can respond positively to this changing environment.</p> <p>3.17 We urge the Plan-making process to take a proactive and innovative approach to development opportunities, especially where these can deliver meaningful and positive impacts on existing provision, as part of the wider strategy to support physical activity and the general health and mental and physical well-being of residents throughout South Gloucestershire.</p> <p>4. Creating exception places and spaces.</p> <p>3.18 High quality design and place-shaping principles, which respond to natural, built and historic assets and local character will provide the ability for the New Local Plan to deliver this priority.</p> <p>3.19 Reference within this priority to new communities to be designed to be walkable and cycleable neighbourhoods requires greater explanation. It is not clear what constitutes a ‘community’ and moreover, there is apparently no consideration of Public Transport accessibility and connectivity within this priority.</p> <p>3.20 There would be concern if a new development standard, premised on the specific requirement for walkable and cycleable neighbourhoods, is imposed without further justification, specifically in terms of how compliance with such a requirement is to be assessed. In doing so, providing the necessary confidence that connectivity and accessibility of new communities, is considered against wider indicators of sustainable development and not just opportunities for walking and cycling.</p> <p>3.21 It is not clear what is meant by promoting ‘opportunities and life chances for all,’ nor how this can be measured as a deliverable outcome. Increasing the supply of housing, in sustainable locations, provides greater opportunities for individuals and different groups to be able to access suitable accommodation. This should be an overarching objective of the growth strategy, but there is some ambiguity as to what this priority means and how the growth strategy can respond positively to it.</p> <p>5. Planning for urban and rural areas.</p> <p>3.22 There is significant cross-over and interdependencies with this potential priority and that listed as priority number 6 (Provide the right type and number of new homes). It is only once the final quantum of new homes is identified will it be possible to determine whether the growth strategy and specific components of it will be sufficient to deliver this priority. In general terms this priority is considered to be appropriate as it reflects the urban focus/regeneration strategy as a sequentially prioritised approach.</p> <p>3.23 In terms of Green Belt, we welcome the fact that neither this potential priority, or the consultation document as a whole, is suggesting at this stage in the Plan-</p>	

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	<p>making process that there will be no consideration of Green Belt release to accommodate new growth.</p> <p>3.24 When reviewing the Green Belt, the need to consider the consequences for sustainable development, as set out at Paragraph 138 of the NPPF, should form the basis of any Green Belt review process. Matters related to sustainability, should not be conflated with the purposes and function of the Green Belt. The consideration of sites/locations for new development should be based on distinct assessment stages to ensure that genuine opportunities for sustainable patterns of development are considered, separate to any assessment as to the contribution to the purposes of the Green Belt of any particular development option.</p> <p>6. Provide the right type and number of new homes.</p> <p>3.25 It should be the overarching objective of the New Local Plan to ensure that sufficient sites are identified to accommodate the LHNA. As part of this process, the extent to which individual site options provide for sustainable patterns of development, support the wider strategic objectives and facilitate the delivery of the identified priorities should be determined.</p> <p>3.26 The scale of growth to be planned for should be sufficient to address locally derived housing need for South Gloucestershire, but also any unmet need arising from neighbouring Authorities, specifically Bristol. Where growth is required to meet the needs of a neighbouring Authority, the strategy should be to locate such growth as close as possible to where that need is arising. Proximity of the origin of particular needs, does not necessarily mean physical proximity, although this is clearly an obvious indicator of successfully addressing need close to source, but it can also mean proximity in terms of accessibility and connectivity, which may mean development is slightly further afield, but remains well connected and related to where that need is arising.</p> <p>3.27 We strongly support a growth strategy which provides for a portfolio of sites, both in terms of size and location. In doing so, this provides greater certainty and resilience to the supply of new homes, not just for the purposes of maintaining a five year housing land supply, but throughout the Plan period. A wider portfolio of sites, in size and locations, will also increase opportunities for new home ownership throughout South Gloucestershire whilst supporting the vitality and vibrancy of settlements throughout the District.</p> <p>3.28 Whilst large scale strategic sites represent a legitimate component of any growth strategy, increasing the range of sites across the District supports communities of all sizes as part of wider strategy for the achievement of sustainable patterns of development.</p> <p>7. Enable a productive, clean and inclusive economy.</p> <p>3.29 The general emphasis of this potential priority is supported given the need to ensure that the new Local Plan responds positively as part of the recovery from the Covid-19 impact.</p>	

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	<p>3.30 Supporting the economic growth strategy will require sufficient employment sites both in terms of size and location, which such sites being sufficiently flexible to respond to the changing economic climate and facilitate new investment and innovation in the economy. Alongside space for businesses to grow, thrive and invest, it is essential that there is a sufficient skilled workforce available and that opportunities for job/economic growth are accessible to residents and potential workforce within South Gloucestershire.</p> <p>3.31 It is noted that within this potential priority there is reference to the need to safeguard employment land and jobs to meet identified needs and this is supported. The new Local Plan must achieve a sustainable balance in terms of maintaining/safeguarding sufficient employment land, against the pressures for such land to be brought forward for residential development.</p> <p>3.32 To some extent there is a conflict between this potential priority and that of planning for urban and rural areas, with the emphasis on ‘optimising’ Brownfield land. It is therefore essential that the New Local Plan considers carefully the use of Brownfield land for residential growth, specifically in terms of the potential for this to undermine the wider economic strategy. Understanding and achieving this balance in respect of Brownfield/regeneration sites, will be an important part of the Plan-making process as it will determine what scale of residential development can be achieved on such sites without adversely impacting the wider economic strategy.</p> <p>8. Achieving sustainable transport and travel.</p> <p>3.33 In delivering this priority it will ensure that new development is accommodated in locations that are accessible and well connected to services, facilities and employment and is therefore supported as a matter of principle. The emphasis of any growth strategy should be to direct growth to locations that are well serviced by Public Transport or locations where enhancements to existing provision provides the opportunities to maximise Public Transport use.</p> <p>3.34 Existing growth areas, such as the Bristol East Fringe, provide obvious locations that should be considered for future growth, both in terms of the strategy for urban centres, but also opportunities for expansion of these locations. These locations benefit from an existing network of town centres and established connections into Bristol.</p> <p>3.35 In terms of the East Fringe, this is defined by the A4174 which is recognised within the consultation document (page 99) as the boundary for most of the East Fringe area. Consequently, opportunities that exist for development within this hard barrier, such as land at Cleve Rugby Club, should be considered as part of this priority.</p> <p>3.36 As an example, land at Cleve Rugby club, located within the East Fringe is well served by existing Public Transport provision, including:</p> <p>? Service 86 – Stagecoach West: serving Yate, Kingswood and Chipping Sodbury;</p>	

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	<p>? Service 462 – Stagecoach West: serving Bristol City Centre;</p> <p>? Service 948 – Stagecoach West: serving Pucklechurch, Emersons Green and Bernard Lovell School;</p> <p>? Service Y5 – First Bristol/South Glos Lynx: service Bristol Bus Station, Yate and Chipping Sodbury.</p> <p>3.37 Alongside the Public Transport that serves land at Cleve Rugby Club, Mangotsfield hosts a wide range of local services, facilities and employment opportunities all within easy access by walking and cycling. The site is also well served by health and education, the latter including Mangotsfield (Secondary) School which located c350m from the site.</p> <p>3.38 We support the priority to achieve sustainable transport and travel patterns and those locations that are consistent with this priority, such as land at Cleve Rugby Club, should be advanced as genuine development options through the Local Plan process.</p> <p>9. Ensuring the timely and effective provision of infrastructure to support growing communities.</p> <p>3.39 This potential priority is supported in terms of its emphasis on achieving sustainable patterns of development. In identifying land/sites to meet identified needs, opportunities to bring forward development which can utilise existing infrastructure should form the starting point for any growth strategy.</p> <p>3.40 Where new development is dependent upon new infrastructure, this should be considered in the context of viability and any burdens placed on specific development sites/locations should be proportionate to their impact.</p>	
Lesley Brown	<p>Pursue a carbon neutral and resilient future. It is good to provide good walking and cycling facilities but it needs to be recognised that this is not always possible for some people such as the very elderly, those with very small children and the disabled. They must also be provided for.</p> <p>Protect and enhance our environment It would be good to see tree lined streets in developments.</p> <p>Provide the right type and number of new homes Need to take into consideration the increase of people who will be working from home in the future which could have a knock on effect of where housing needs to be. South Gloucestershire seemed to be taking an unfair share of new housing under the previous JSP proposals. I hope this will be evened out more with BANES, in particular, taking their fair share.</p> <p>Ensuring the timely and efficient provision of infrastructure to support growing communities This is extremely important. All too often we see large housing developments</p>	15 Feb 2021

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	where supporting services and facilities take years to materialise placing undue pressure, and consequently resentment, on the existing community. It needs to be provided in a timely fashion.	
Linda Byrne - Siston Hill Residents Association	As above, Air Quality should be a major priority.	08 Dec 2020
Liz Pickering - Department for Education	<p>9. The potential priorities for the Local Plan include several that pertain to education, including education opportunities that help reduce health inequalities (Priority 3); close proximity of development to key services and facilities (Priority 8); and the requirement for new development to support the long-term success and sustainability of Schools (Priority 9).</p> <p>10. In response to your consultation questions on these potential priorities, the Department agrees with these priorities. However, the success of the Plan will depend on the deliverability of new Schools and School expansions at the right time to meet the needs generated by new housing. The Plan will need to ensure that locations for growth are sustainable not only from an environmental perspective, but also from an economic perspective to ensure that development can and will deliver essential infrastructure such as Schools. Please see our advice on site allocations and developer contributions below.</p>	26 Mar 2021
Lizzie Staley	I hope everyone takes heed to these priorities, because developers have a track record of ignoring them. They don't live in the area so it doesn't affect them negatively if these priorities are ignored, rather they make more money for themselves. And they can afford to move wherever they want and pay for private healthcare, private schools, nice vehicles that can get through floods, and buy their own land to live on and keep away from everyone else.	28 Feb 2021
Lorna Gould	New Priority - to reconsider historical established settlement boundaries and green belt land which have artificially split the developed village for no obvious reason.	28 Feb 2021
Louise Powell - Thornbury Town Council	The priorities look fine but it important that these are consistently dealt with throughout the plan and not forgotten. They must be given 'teeth' to be able to be implemented/ addressed. At every stage they should be considered in a linked and holistic manner.	08 Apr 2021
Mactaggart & Mickel - Frampton Cotterell	<p>Many Local Plans list priorities but these are seldom carried through into a robust Local Plan which sets out clear policies and proposals for a 20 year period. It is extremely easy to provide a list of priorities but the important part of the Plan is that it is robust, can respond to potential changes during the Plan period and ultimately delivers.</p> <p>Unfortunately, this has not happened previously in the District and lessons need to be learned.</p>	07 Apr 2021
Mactaggart & Mickel Homes England Ltd	<p>See attached representations.</p> <p>3.11 Priority 6 should be clear that the objective is to embrace growth and significantly boost housing supply, in accordance with NPPF paragraph 59. The objective of meeting identified needs should be expressed as a minimum.</p>	05 May 2021

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	<p>Furthermore, it should be a priority that the Local Plan ensures that housing supply is boosted and a variety of sites are allocated to ensure that many begin delivering immediately. The Local Plan must learn from the experience of the current Core Strategy as outlined in issue no. 32, whereby it was too reliant on a small number of large sites which created a housing land supply shortfall very quickly after the Plan's adoption and that has only been caught up from in the last c. 18 months.</p> <p>3.12 It is acknowledged that the priority 6 identifies the requirement to 'provide a portfolio of sites, of different sizes, in a range of sustainable locations across South Gloucestershire' (Page 57). It is supported that the Spatial Strategy is underpinned by focusing development at 'accessible' locations that are well related to existing urban areas, served by existing sustainable transport routes, or with the 'potential' to be sustainable as a result of the 'type and form' of development proposed. This should be achieved through a detailed review of the Green Belt and an assessment of the most sustainable rural settlements which hold a number of the characteristics required to achieve sustainable development. Such a review would lead to achieving more sustainable patterns of development across the District in accordance with the South Gloucestershire Council's Climate Emergency declaration.</p>	
Mactaggart & Mickel - Pilning	The Green Belt should be reviewed in the District as part of the preparation of this Local Plan.	25 Mar 2021
Margaret Haynes	Very pleased that they seem to prioritise achieving pursuing a carbon neutral future, protecting and enhancing the environment, health and wellbeing and sustainable travel and transport.	27 Feb 2021
Marian Gilpin	Development on land at high risk of flooding should not be considered - even if enough low risk land is not available. A New settlement would be infinitely preferable - of course with proper high speed public transport links to urban areas for work.	09 Feb 2021
Martyn Hall	<p>The thornbury line is just the other side of the a38 and requires 1/4 mile line installed through the tunnel which is in good condition to the field by Grovesend roundabout which if purchased would see a huge reduction in traffic since people could use the train to Yate Bristol and further afield.</p> <p>BT has a lot of people in Thornbury who will be driving to Bristol later this year to the new building so that's approximately 1000 people driving into Bristol !.</p> <p>If there was a train people would use it but there is no way on earth we would use the bus taking 1.5 to 3 hours !!!!</p> <p>Listen to the people of thornbury</p>	26 Feb 2021
Matt Griffith - Business West	<p>22. Overall we are supportive with the priorities outlined. In particular, we want to stress the priorities that should drive the South Gloucestershire Local Plan:</p> <ul style="list-style-type: none"> o Supplying of new housing to meet the region's needs: resilient short term (5 years) and long term housing supply to avoid speculative development, and extension of affordable housing provision. o Planning to minimise the need to travel and decarbonisation or promotion of low Carbon modes of transport – there is an urgent need for a transport led approach to 	25 Mar 2021

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	<p>sustainable development.</p> <p>? Better and more extensive Public Transport networks.</p> <p>? Promote cycling and walking paths, create liveable neighbourhoods.</p> <p>? Address the West-East connections issues, particularly from the Bristol East and North Fringes to Avonmouth and Severnside.</p> <p>o Safeguard and extend employment land where there is demand to guarantee a rapid and sustainable economic growth: to regenerate the local economy. This includes planning sufficient supply for the various needs and types of supply for the full range of business types and sectors within South Gloucestershire.</p> <p>o Robust review of the Green Belt under sustainability criteria.</p> <p>o Cross-regional approach to development, especially on transport and employment and labour market connections with Bristol.</p>	
Matthew McCollom	<p>Planning for Urban and Rural Areas. This statement "If the Bristol and Bath Green Belt is reviewed, and parts of it are required to meet growth needs, ensure its long-term purpose and function is maintained and its recreational value enhanced." implies that the Green Belt will be reviewed and parts of it will be required, which entirely undermines the second part of the same statement about maintaining the long term purpose and function of Green Belt. These include checking the unrestricted sprawl of built-up areas and the merging of neighbouring communities. A feature of Green Belt is its permanence.</p>	28 Feb 2021
Maurice Wayne	<p>Affordable Housing should be a priority</p>	08 Feb 2021
Mel Clinton - Nash Partnership	<p>Enable a productive, clean and inclusive economy – it is suggested that ensuring development responds to changing patterns of working, including home working, is added under this heading.</p>	01 Mar 2021
Melinda Evans	<p>It is difficult to disagree with these sweeping priorities. However to enhance these:</p> <ol style="list-style-type: none"> 1. Pursue a carbon neutral and resilient future in a changing climate - identify land that is suitable for use as community energy sites (solar and onshore wind). This would reduce a significant barrier to community energy projects that can rely a lot on voluntary time. 2. Protect and enhance our environment. Fragmentation of wildlife is a real problem. Strategic networks for broadleaved woodland, grassland and wetland habitat have been mapped by the West of England Nature Partnership and will form the baseline for South Gloucestershire's Green Infrastructure Strategy and the Nature Recovery Network. Any new developments should not be permitted in these areas, the Plan must recognise the strategic importance of these areas, especially as the Council has declared this to be an emergency. 6. Provide the right type and number of new homes - it is accepted that affordable homes are needed. Targets for affordable housing as determined by this Plan must be maintained in any subsequent developments, otherwise the creditability of this 	01 Mar 2021

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	<p>Plan and Council is undermined.</p> <p>8. Achieving sustainable travel and transport. Creation of safe cycle routes that are actually separate from vehicular traffic is essential. At scale, at pace and with urgency. E-bikes have been called a "game-changer" in terms of engaging those who are reluctant to use bikes and/or those who live further afield.</p>	
Michelle Greaves	yes and on the order - except 8 and 9 transport and infrastructure should be 5th and 6th	03 Feb 2021
Midland Commercial	<p>Please see enclosed submission.</p> <p>4.19 We welcome the work that the Council has done to identify potential priorities and the clear approach to setting these out within the consultation document. Our clients would like to express good support for each of those priorities. Within the scope of these representations we would like to welcome the approach adopted in respect of Priority 7 to “enable a productive, clean and inclusive economy,” but would suggest that this could go further to identifying the critical importance of ensuring sufficient land is available at the right time in the right place to meet market requirements. The NPPF and National Planning Practice Guidance, establish the need for a strong evidence base reflecting market signals, and this is of critical importance and may very well identify new priorities going forward.</p> <p>4.20 We have previously referred to the recognition in the Plan elsewhere that:</p> <p>“There is not a great amount of undeveloped employment land remaining in South Gloucestershire.”</p> <p>4.21 The Council will clearly wish to reverse this position as a priority within the early years of the emerging Plan.</p> <p>4.22 We support the need to address each of the issues raised within Priority 7, namely to:</p> <ul style="list-style-type: none"> - Ensure a “green” economic recovery from Covid-19 and growth of green technology and clean businesses and sectors. - Rethink town centres and High Streets, in terms of what they offer and how they operate. - Build on and enhance digital connectivity across the area. - Plan for the employment land and jobs required to meet the needs identified by the West of England Spatial Development Strategy. - Ensure safeguarded employment sites are flexible and attractive to accommodate businesses of all sizes, including key local sectors in a rapidly changing economic and retail environment. - Ensure a balanced range of safeguarded employment land across South Gloucestershire, so that all communities have access to job opportunities that are 	26 Apr 2021

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	<p>accessible by walking, cycling and effective Public Transport.</p> <p>- Build on the potential for tourism and the visitor economy in our area.”</p> <p>4.23 We would however suggest that:</p> <ul style="list-style-type: none"> • The scope of issues and priorities will need to be addressed as the Combined Authority prepare the SDS; • The evidence base may well point to new issues and priorities, or the need for a greater level of detail; • More emphasis should be made in respect of providing sufficient employment land at the right time in the right location across the Plan period. 	
Miller	As above.	01 Dec 2020
Mr. A. D. England	<p>Please see enclosed submission.</p> <p>4.1 Within the scope of these representations we support the identification of potential priorities within the consultation document. Seeking to achieve the potential priorities should promote sustainable patterns of development over the Plan period. For example, in order to pursue a Carbon resilient future and in accordance with South Gloucestershire Council’s Climate Emergency declaration the Local Plan 2020 should look to direct growth to areas which are inherently connected to existing settlements in proximity to strategic employment facilities, well served by sustainable transport infrastructure and provide opportunities to maximising the use of both Public Transport and active travel routes. It is notable that the North Fringe is the area where jobs most exceed workers, with the implication that new housing should be allocated in this location. Prioritising growth in areas which benefit from such principles will inevitably help the Local Authority achieve a better balance between future employment and residential requirements, reduce the need and reliance on private transport to commute further afield whilst encouraging more active forms of transport thereby reducing Carbon emission through healthier lifestyle choices.</p>	29 Mar 2021
Mr. and Mrs. Drew and Mr. and Mrs. Bennett	<p>Priority 5 states, “Share the benefits of well-planned growth and prosperity across urban and appropriate rural communities.”</p> <p>Cromhall is such a rural community for well-planned growth.</p>	19 Apr 2021
Mr. Blake - Oldland Parish Council	<p>A. Climate Changes issues a must</p> <p>B. More consideration for the needs of OAP's with housing, healthcare, mobility, transport and dealing with Bank closures and increasing IT dependency</p> <p>C. Peoples needs to improve Health and Wellbeing</p> <p>D. Schools to teach/practice more of lifes essential necessaties and less emphasis and pressure on achieving academic prowess</p>	17 Feb 2021
Neil Salter - Avon County Scout Council	<p>Please see attached document.</p> <p>3.3 It is noted that the 9 potential priorities are not specifically listed in order of</p>	08 Apr 2021

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	<p>priority/importance which is correct. However, the future growth strategy must respond to identified need, so there is a case to be made that delivering the right type and number of new homes, should form the overarching objective.</p> <p>3.4 We consider each ‘Potential Priority’ in turn.</p> <p>1. Pursue a Carbon neutral and resilient future in a changing climate.</p> <p>3.5 This priority reinforces the national agenda and is supported as a matter of principle. Greater clarity is required in terms of what implications such priorities have on individual development schemes, and also whether the objective of Carbon neutrality is a calculation that is taken overall, rather than a measure of the acceptability of individual growth locations.</p> <p>3.6 Requirements for zero-Carbon and energy efficient design and construction are also supported in principle, so long as the Local Plan is based on detailed considerations of the viability implications. This is necessary to ensure that growth requirements can be achieved during the Plan period.</p> <p>3.7 Low-carbon and renewable energy generation, alongside increasing the resilience to Climate Change, are all important measures that the Local Plan will need to implement in order to respond positively to the declared climate emergency. Therefore, there is no objection in principle to the nature of this priority.</p> <p>2. Protect and enhance our environment.</p> <p>3.8 This priority replicates the obligations on Local Planning Authorities as set out in Sections 15 and 16 of the National Planning Policy Framework, therefore as priorities to inform the preparation of the New Local Plan, these are supported in principle.</p> <p>3.9 In achieving this priority, it should be recognised that in specific circumstances, new development can play an important role, through the delivery of improvements and enhancements to existing conditions.</p> <p>3.10 In pursuing this priority, the new Local Plan should avoid circumstances where blanket restrictions on development occur. In doing so, ensuring that future locations for growth to meet identified need, are considered on their individual merit and their capacity to successfully respond to their specific circumstances, whilst supporting the overall aspiration of this potential priority.</p> <p>3.11 Furthermore, there should be greater attention, not just on the protection and enhancement of the natural environment, but also greater access to it. In doing so, helping to achieve tangible benefits in terms of promoting health well-being - see Issue 13 and Potential Priority 3.</p> <p>3. Development that promotes health and well-being.</p>	

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	<p>3.12 It is part of the social objective to sustainable development that health, social and cultural well-being is identified within the NPPF as a function of the planning system. Access to usable and appropriate open/green spaces, alongside good quality residential amenity is an important component of this priority.</p> <p>3.13 We fully support this as a priority for the preparation of the new Local Plan and refer back to our comments in respect of Issue 13. Accommodating future development at locations which facilitate non car-based movements, whether this is walking or cycling or Public Transport, will be critical in terms of the Plan achieving this ambitions of this priority.</p> <p>3.14 It should also be recognised that in some circumstances, development can provide valuable capital investment that will assist in the retention and/or enhancement of existing opportunities for outdoor activities and exercise. In this context we refer back to our promotion of land at Woodhouse Park.</p> <p>3.15 In such scenarios we urge the Plan-making process to take a proactive and innovative approach to development opportunities that will directly support opportunities for the health (physical and mental) and well-being of residents.</p> <p>4. Creating exception places and spaces.</p> <p>3.16 High quality design and place-shaping principles, which respond to natural, built and historic assets and local character will provide the ability for the New Local Plan to deliver this priority.</p> <p>3.17 Reference within this priority to new communities to be designed to be walkable and cycleable neighbourhoods requires greater explanation. It is not clear what constitutes a ‘community’ and moreover, there is apparently no consideration of Public Transport accessibility and connectivity within this priority. There would be concern if a new development standard, was premised on the specific requirement for walkable and cycleable neighbourhoods, with little or no regard to accessibility and connectivity provided by Public Transport provision.</p> <p>3.18 It is not clear what is meant by promoting ‘opportunities and life chances for all,’ nor how this can be measured as a deliverable outcome. Increasing the supply of housing, in sustainable locations, provides greater opportunities for individuals and different groups to be able to access suitable accommodation. This should be an overarching objective of the growth strategy, but there is some ambiguity as to what this priority means and how the growth strategy can respond positively to it.</p> <p>5. Planning for urban and rural areas.</p> <p>3.19 There is significant cross-over and interdependencies with this potential priority and that listed as priority number 6 (Provide the right type and number of new homes). It is only once the final quantum of new homes is identified will it be possible to determine whether the growth strategy and specific components of it will be sufficient to deliver this priority. In general terms this priority is considered to be appropriate as it reflects the urban focus/regeneration strategy as sequentially</p>	

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	<p>prioritised approach.</p> <p>3.20 In terms of Green Belt, we welcome the fact that neither this potential priority, or the consultation document as a whole, is suggesting at this stage in the Plan-making process that there will be no consideration of Green Belt release to accommodate new growth.</p> <p>3.21 When reviewing the Green Belt the need to consider the consequences for sustainable development, as set out at Paragraph 138 of the NPPF, should form the basis of any Green Belt review process. Matters related to sustainability, should not be conflated with the purposes and function of the Green Belt. The consideration of sites/locations for new development should be based on distinct assessment stages, ensuring that genuine opportunities for sustainable development are considered separately to any assessment of the contribution to the purposes of the Green Belt.</p> <p>6. Provide the right type and number of new homes.</p> <p>3.22 It should be the overarching objective of the new Local Plan to ensure that sufficient sites are identified to accommodate the LHNA. As part of this process, the extent to which individual site options provide for sustainable patterns of development, support the wider strategic objectives and facilitate the delivery of the identified priorities should form part of the Plan-making process.</p> <p>3.23 The scale of growth to be planned for should be sufficient to address locally derived housing need for South Gloucestershire, but also any unmet need arising from neighbouring Authorities, specifically Bristol. Where growth is required to meet the needs of a neighbouring Authority, the strategy should be to locate such growth as close as possible to where that need is arising.</p> <p>3.24 Proximity of development close to the origin of particular needs, does not necessarily mean physical proximity, although this is clearly an obvious indicator of successfully addressing need close to source. It can also mean proximity in terms of accessibility and connectivity, which may mean development is slightly further afield, but remains well connected and related to where that need is arising.</p> <p>3.25 We strongly support a growth strategy which provides for a portfolio of sites, both in terms of size and location. In doing so, this will provide greater certainty and resilience to the supply of new homes, not just for the purposes of maintaining a five-year housing land supply, but throughout the Plan period. A wider portfolio of sites will also increase opportunities for new home ownership throughout South Gloucestershire, whilst supporting the vitality and vibrancy of settlements throughout the District.</p> <p>3.26 Whilst large scale strategic sites represent a legitimate component of any growth strategy, increasing the range of sites across the District supports communities of all sizes, as part of wider strategy for the achievement of sustainable patterns of development.</p> <p>7. Enable a productive, clean and inclusive economy.</p>	

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	<p>3.27 The general emphasis of this potential priority is supported, given the need to ensure that the new Local Plan responds positively in support of the recovery from the Covid-19 impact.</p> <p>3.28 Supporting the economic growth strategy will require sufficient employment sites both in terms of size and location, with sites being sufficiently flexible to respond to the changing economic climate and facilitate new investment and innovation in the economy. Alongside space for businesses to grow, thrive and invest, it is essential that there is a sufficient skilled workforce available and that opportunities for job/economic growth are accessible to existing and future residents.</p> <p>3.29 It is noted that within this potential priority there is reference to the need to safeguard employment land and jobs to meet identified needs. This is supported and in this regard it is considered that the new Local Plan must achieve a sustainable balance in terms of maintaining/safeguarding sufficient employment land, against the pressures for such land to be brought forward for residential development.</p> <p>3.30 To some extent there is a conflict between this potential priority and that of planning for urban and rural areas, with the emphasis on ‘optimising’ Brownfield land. It is therefore essential that the New Local Plan considers carefully the use of Brownfield land for residential growth, specifically in terms of the potential for this to undermine the wider economic strategy. Understanding and achieving this balance in respect of Brownfield/regeneration sites, will be an important part of the Plan-making process as it will determine what scale of residential development can be achieved on such sites without adversely impacting the wider economic strategy.</p> <p>8. Achieving sustainable transport and travel.</p> <p>3.31 In delivering this priority it will ensure that new development is accommodated in locations that are accessible and well connected to services, facilities and employment and is therefore supported as a matter of principle. The emphasis of any growth strategy should be to direct growth at locations that are well serviced by Public Transport or locations where enhancements to existing provision provides the opportunities to maximise Public Transport use.</p> <p>9. Ensuring the timely and effective provision of infrastructure to support growing communities.</p> <p>3.32 This potential priority is supported as it facilitates the achievement of sustainable patterns of development. In identifying land/sites to meet identified needs, opportunities to bring forward development which can utilise existing infrastructure should form the starting point for any growth strategy. Where new development is dependent upon new infrastructure, this should be considered in the context of viability and any burdens placed on specific development sites/locations should be proportionate to their impact.</p> <p>3.33 As per potential priority 6 (Provide the right type and numbers of new homes),</p>	

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	<p>maximising or expanding the portfolio of sites, both in terms of size and locations, will reduce the reliance on large strategic sites which are often dependent upon significant infrastructure. A wider range of site sizes can facilitate the early delivery of new homes, providing the opportunity for larger scale strategic development locations to progress and begin to deliver later in the Plan period.</p>	
<p>Newland Homes - Land at Aust Road</p>	<p>1. Pursue a Carbon neutral and resilient future in a changing climate.</p> <p>3.2 Climate Change is rightly identified as a key issue that the Local Plan should seek to address and we are supportive of the Council's ambitions to achieve Carbon neutrality by 2030.</p> <p>3.3 With regard to Housing Delivery, we agree that it is important for new development to support the de-carbonisation of transport to minimise usage of the private motor vehicle and maximise opportunities for walking and cycling. It will be imperative to locate development where access to existing or new services, facilities, employment opportunities and Public Transport are/will be strong.</p> <p>3.4 Furthermore, the advent of electric vehicles and increased levels of home-working are not reasons that would justify a significant departure from this approach. This is because there are significant economic and social benefits to ensuring that people can access the above through a variety of means.</p> <p>3.5 However, one also needs to be realistic in acknowledging individual travel patterns and behaviours will still mean additional vehicular journeys will be required. This can be mitigated by ensuring that where vehicular journeys will be made, the relative distance required to access services, facilities and employment opportunities are minimised. This would, naturally, support development at existing key settlements and areas with good access to the Bristol Urban Fringe and the key Market Towns (e.g. Yate and Thornbury).</p> <p>3.6 That said, maximising the potential for sustainable patterns of development will only go so far. A significant contributor to emissions is energy consumption within individual dwellings and, as a result, we also support a requirement for higher energy efficiency standards to minimise energy demand. We note that the Government has now withdrawn its intention to restrict Councils' ability to set higher energy performance standards than those prescribed in the Building Regulations. As such, we would support an approach which sought to achieve a higher standard than would otherwise be imposed at a national level.</p> <p>3.7 Furthermore, the Government are still pursuing their Future Homes Standard which will require all new homes to be highly efficient with low Carbon heating and zero Carbon ready by 2025. Requiring all new homes to be Carbon neutral upon the Plan's adoption would not be such a significant step up from what will, ultimately, be the status quo moving forward and so we would support this approach.</p> <p>2. Protect and enhance our environment.</p> <p>3.8 The Environment is the next identified theme and, again, we are entirely</p>	<p>14 May 2021</p>

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	<p>supportive of the need to ensure that development leads to a betterment of the District's Biodiversity and Green Infrastructure assets and should seek to exceed identified standards where possible.</p> <p>3. Development that promotes health and well-being.</p> <p>3.9 Again, we are generally supportive of this priority and are committed to ensuring that high-quality open space and access to active/Public Transport routes/connections are provided.</p> <p>4. Creating exceptional places and spaces.</p> <p>3.10 All development should aspire to secure the highest standards of urban design and so we fully support the need for areas of growth to be legible, walkable and beautiful places to work, live and play.</p> <p>5. Planning for urban and rural areas.</p> <p>3.11 Naturally, we support any attempts to maximise the development potential within existing urban and rural settlements. However, we also welcome the acknowledgment that this will only go so far in meeting overall housing needs and that greenfield sites will be needed to meet the development needs of the District and other WECA members. We would note that this conclusion is also reached by the Sustainability Appraisal (SA).</p> <p>3.12 For reasons set out later in this document, we consider exceptional circumstances will exist to justify the removal of land from the Green Belt to support the Council's development needs. Where this is necessary, we wholeheartedly support the need to ensure that new boundaries are robust and defensible to improve its important function of restricting further urban sprawl.</p> <p>3.13 We would note that the SA indicates that there will likely be significant sustainability benefits associated with the release of Green Belt land for both strategic and non-strategic levels of development and that this should be explored through the Local Plan process.</p> <p>6. Provide the right type and number of new homes.</p> <p>3.14 We await the progression of the West of England SDS for further details on the housing requirement that will ultimately be adopted. The only thing we would note is that the Standard Method yields a slightly higher minimum annual requirement than the adopted Core Strategy (1,360 vs 1,412 dwellings per annum).</p> <p>3.15 We are also mindful that there has been a significant increase to Bristol's need following the revisions to the Standard Method (which has added around 830 dwellings to their annual requirement). Given the limited availability of land within Bristol's administrative boundary, it is unlikely that it will be able to meet its previously predicted need, let alone this increased minimum requirement itself.</p>	

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	<p>3.16 Furthermore, constraints around Bath will likely limit the scope for it to accommodate some of Bristol's unmet need and so the onus will be on South Gloucestershire (and potentially North Somerset) to assist in meeting Bristol's unmet needs. As such, we would expect South Gloucestershire's minimum housing requirement be uplifted significantly from the standard method figure to account for this.</p> <p>3.17 It will be important for progress to be made on the SDS and to reach a joint position with North Somerset in order to understand how housing will need to be distributed across the region and allow for effective and viable options to be considered.</p> <p>3.18 We welcome the acknowledgment of the difficulties the Council has had with delivery in recent years and we would stress that the deliverability of any strategy should be a central guiding principle for the Plan. Large strategic sites will be essential to securing the overall housing requirement; however, they tend to have long lead in times, can have various complexities and often need to secure enabling infrastructure in advance of their delivery.</p> <p>3.19 The Council has had first-hand experience of this in recent years with delays to the Cribbs Patchway and East of Harry Stoke New Neighbourhoods being a key reason for their deficient housing land supply position. This has facilitated significant levels of speculative development at settlements beyond the Green Belt and placed significant pressure on rural communities to make up the shortfall. Such development is not necessarily unsustainable, but it sits outside of the adopted Plan's overarching development framework which would otherwise secure a more socially, environmentally and economically sustainable outcome.</p> <p>3.20 Consequently, it is imperative that the Council identify Strategic Development Locations with deliverability at the forefront of any considerations. Development locations that would require significant upfront enabling infrastructure should be carefully considered against alternative locations with less onerous requirements.</p> <p>3.21 Another important factor to consider is the relatively compressed timescale for the Local Plan and how this will affect the delivery of housing. The new Local Plan will cover a period of 15 years which is five years less than the JSP; however, the housing requirement has remained around the same level (c. 80,000 dwellings) for the WECA Authorities[1]. In simple terms, the WoE Authorities are going to have to plan for a similar amount of housing to the JSP in a shorter period of time.</p> <p>3.22 This compressed timescale also means that anticipated delivery from large strategic sites over the Plan period will be reduced, especially when one factors in lead in times and applies realistic trajectories to the delivery of housing[2]. The Phase 1 document has raised the importance of ensuring that the final strategy is deliverable and any slips to delivery on identified strategic sites could have serious consequences for the Council in demonstrating a deliverable supply of housing over the longer-term.</p> <p>[1] Albeit the distribution is more heavily weighted toward Bristol.</p>	

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	<p>[2] The often cited 'From Start to Finish' report by Lichfields should inform these assumptions.</p> <p>3.23 The potential result is that a greater number of SDLs will need to be identified compared with the JSP to mitigate this risk, with a proportion of these delivering housing beyond the end of the Plan period. The Local Plan will, therefore, need to take a longer-term view at this stage in the interests of ensuring the medium-term development needs of the District are met.</p> <p>3.24 We would, therefore, strongly urge the Council to review alternative locations for growth and prioritise those which would require significantly less onerous infrastructure to facilitate their delivery and more realistically and reliably deliver the housing the Council needs over the Plan period.</p> <p>3.25 This strategy should also be supplemented by an appropriate level of growth at the rural villages. Development at these villages is often required to ensure their vitality and viability is maintained and to ensure that important services (shops, GP Surgeries, Schools etc) are not lost. The Green Belt constraint at a number of rural villages has limited the scope for development to come forward in recent Decades and this has placed a disproportionate amount of pressure on non-Green Belt settlements, especially in the context of a deficient housing land supply position (e.g. Falfield and Wickwar).</p> <p>3.26 Furthermore, the majority of the Green Belt villages are located in close proximity to important settlements or the Bristol Urban fringe. This makes them generally more sustainable locations for growth than their non-Green Belt counterparts.</p> <p>3.27 Appropriate levels of growth at both Green Belt and non-Green Belt villages can help to underpin housing delivery, particularly in the early periods of the Plan period as larger strategic sites navigate their way through the planning process.</p> <p>7. Enable a productive, clean and inclusive economy.</p> <p>3.28 We are generally supportive of this priority and are especially supportive of the need to enhance digital connectivity across the area in light of shifting working patterns as a result of the pandemic.</p> <p>8. Achieving sustainable travel and transport.</p> <p>3.29 Page 47 of the Consultation Document provides a useful summary of travel to work patterns and the level of self-containment (in this context defined by the percentage of people who live and work in the same area) of certain parts of the District. What this illustrates is that not only does the North Fringe of Bristol benefit from high levels of self-containment, but also that it acts as a magnet for the wider South Gloucestershire area with significant levels of in-commuting from Avonmouth, Thornbury, Yate and the Eastern Fringe.</p>	

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	<p>3.30 Locating development in close proximity/with good transport access to the Northern Fringe will be important in securing the most sustainable patterns of travel across the District.</p> <p>9. Ensuring the timely and efficient provision of infrastructure to support growing communities.</p> <p>3.31 We support this priority and agree that it is essential that new and growing communities are supported by an appropriate level of infrastructure to maintain and enhance their general sustainability.</p> <p>3.32 The key, as we have touched on above, is ensuring that the scope and need to deliver this infrastructure does not constrain the timely delivery of housing. This can be achieved through the identification of appropriate and deliverable SDLs which are underpinned by an appropriate level of non-strategic growth at the rural villages.</p>	
<p>Newland Homes - Land West of The B4061 Bristol Road</p>	<p>1. Pursue a Carbon neutral and resilient future in a changing climate.</p> <p>3.2 Climate Change is rightly identified as a key issue that the Local Plan should seek to address and we are supportive of the Council's ambitions to achieve Carbon neutrality by 2030.</p> <p>3.3 With regard to Housing Delivery, we agree that it is important for new development to support the de-carbonisation of transport to minimise usage of the private motor vehicle and maximise opportunities for walking and cycling. It will be imperative to locate development where access to existing or new services, facilities, employment opportunities and Public Transport are/will be strong.</p> <p>3.4 Furthermore, the advent of electric vehicles and increased levels of home-working are not reasons that would justify a significant departure from this approach. This is because there are significant economic and social benefits to ensuring that people can access the above through a variety of means.</p> <p>3.5 However, one also needs to be realistic in acknowledging individual travel patterns and behaviours will still mean additional vehicular journeys will be required. This can be mitigated by ensuring that where vehicular journeys will be made, the relative distance required to access services, facilities and employment opportunities are minimised. This would, naturally, support development at existing key settlements and areas with good access to the Bristol Urban Fringe and the key Market Towns (e.g. Yate and Thornbury).</p> <p>3.6 That said, maximising the potential for sustainable patterns of development will only go so far. A significant contributor to emissions is energy consumption within individual dwellings and, as a result, we also support a requirement for higher energy efficiency standards to minimise energy demand. We note that the Government has now withdrawn its intention to restrict Councils' ability to set higher energy performance standards than those prescribed in the Building Regulations. As such, we would support an approach which sought to achieve a higher standard than would otherwise be imposed at a national level.</p>	<p>13 May 2021</p>

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	<p>3.7 Furthermore, the Government are still pursuing their Future Homes Standard which will require all new homes to be highly efficient with low Carbon heating and zero Carbon ready by 2025. Requiring all new homes to be Carbon neutral upon the Plan's adoption would not be such a significant step up from what will, ultimately, be the status quo moving forward and so we would support this approach.</p> <p>2. Protect and enhance our environment.</p> <p>3.8 The Environment is the next identified theme and, again, we are entirely supportive of the need to ensure that development leads to a betterment of the District's Biodiversity and Green Infrastructure assets and should seek to exceed identified standards where possible.</p> <p>3. Development that promotes health and well-being.</p> <p>3.9 Again, we are generally supportive of this priority and are committed to ensuring that high-quality open space and access to active/Public Transport routes/connections are provided.</p> <p>4. Creating exceptional places and spaces.</p> <p>3.10 All development should aspire to secure the highest standards of urban design and so we fully support the need for areas of growth to be legible, walkable and beautiful places to work, live and play.</p> <p>5. Planning for urban and rural areas.</p> <p>3.11 Naturally, we support any attempts to maximise the development potential within existing urban and rural settlements. However, we also welcome the acknowledgment that this will only go so far in meeting overall housing needs and that greenfield sites will be needed to meet the development needs of the District and other WECA members. We would note that this conclusion is also reached by the Sustainability Appraisal (SA).</p> <p>3.12 For reasons set out later in this document, we consider exceptional circumstances will exist to justify the removal of land from the Green Belt to support the Council's development needs. Where this is necessary, we wholeheartedly support the need to ensure that new boundaries are robust and defensible to improve its important function of restricting further urban sprawl.</p> <p>3.13 We would note that the SA indicates that there will likely be significant sustainability benefits associated with the release of Green Belt land for both strategic and non-strategic levels of development and that this should be explored through the Local Plan process.</p> <p>6. Provide the right type and number of new homes.</p>	

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	<p>3.14 We await the progression of the West of England SDS for further details on the housing requirement that will ultimately be adopted. The only thing we would note is that the Standard Method yields a slightly higher minimum annual requirement than the adopted Core Strategy (1,360 vs 1,412 dwellings per annum).</p> <p>3.15 We are also mindful that there has been a significant increase to Bristol's need following the revisions to the Standard Method (which has added around 830 dwellings to their annual requirement). Given the limited availability of land within Bristol's administrative boundary, it is unlikely that it will be able to meet its previously predicted need, let alone this increased minimum requirement itself.</p> <p>3.16 Furthermore, constraints around Bath will likely limit the scope for it to accommodate some of Bristol's unmet need and so the onus will be on South Gloucestershire (and potentially North Somerset) to assist in meeting Bristol's unmet needs. As such, we would expect South Gloucestershire's minimum housing requirement be uplifted significantly from the standard method figure to account for this.</p> <p>3.17 It will be important for progress to be made on the SDS and to reach a joint position with North Somerset in order to understand how housing will need to be distributed across the region and allow for effective and viable options to be considered.</p> <p>3.18 We welcome the acknowledgment of the difficulties the Council has had with delivery in recent years and we would stress that the deliverability of any strategy should be a central guiding principle for the Plan. Large strategic sites will be essential to securing the overall housing requirement; however, they tend to have long lead in times, can have various complexities and often need to secure enabling infrastructure in advance of their delivery.</p> <p>3.19 The Council has had first-hand experience of this in recent years with delays to the Cribbs Patchway and East of Harry Stoke New Neighbourhoods being a key reason for their deficient housing land supply position. This has facilitated significant levels of speculative development at settlements beyond the Green Belt and placed significant pressure on rural communities to make up the shortfall. Such development is not necessarily unsustainable, but it sits outside of the adopted Plan's overarching development framework which would otherwise secure a more socially, environmentally and economically sustainable outcome.</p> <p>3.20 Consequently, it is imperative that the Council identify Strategic Development Locations with deliverability at the forefront of any considerations. Development locations that would require significant upfront enabling infrastructure should be carefully considered against alternative locations with less onerous requirements.</p> <p>3.21 Another important factor to consider is the relatively compressed timescale for the Local Plan and how this will affect the delivery of housing. The new Local Plan will cover a period of 15 years which is five years less than the JSP; however, the housing requirement has remained around the same level (c. 80,000 dwellings) for the WECA Authorities[1]. In simple terms, the WoE Authorities are going to have</p>	

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	<p>to plan for a similar amount of housing to the JSP in a shorter period of time.</p> <p>3.22 This compressed timescale also means that anticipated delivery from large strategic sites over the Plan period will be reduced, especially when one factors in lead in times and applies realistic trajectories to the delivery of housing[2]. The Phase 1 document has raised the importance of ensuring that the final strategy is deliverable and any slips to delivery on identified strategic sites could have serious consequences for the Council in demonstrating a deliverable supply of housing over the longer-term.</p> <p>[1] Albeit the distribution is more heavily weighted toward Bristol.</p> <p>[2] The often cited 'From Start to Finish' report by Lichfields should inform these assumptions.</p> <p>3.23 The potential result is that a greater number of SDLs will need to be identified compared with the JSP to mitigate this risk, with a proportion of these delivering housing beyond the end of the Plan period. The Local Plan will, therefore, need to take a longer-term view at this stage in the interests of ensuring the medium-term development needs of the District are met.</p> <p>3.24 We would, therefore, strongly urge the Council to review alternative locations for growth and prioritise those which would require significantly less onerous infrastructure to facilitate their delivery and more realistically and reliably deliver the housing the Council needs over the Plan period.</p> <p>3.25 This strategy should also be supplemented by an appropriate level of growth at the rural villages. Development at these villages is often required to ensure their vitality and viability is maintained and to ensure that important services (shops, GP Surgeries, Schools etc) are not lost. The Green Belt constraint at a number of rural villages has limited the scope for development to come forward in recent Decades and this has placed a disproportionate amount of pressure on non-Green Belt settlements, especially in the context of a deficient housing land supply position (e.g. Falfield and Wickwar).</p> <p>3.26 Furthermore, the majority of the Green Belt villages are located in close proximity to important settlements or the Bristol Urban fringe. This makes them generally more sustainable locations for growth than their non-Green Belt counterparts.</p> <p>3.27 Appropriate levels of growth at both Green Belt and non-Green Belt villages can help to underpin housing delivery, particularly in the early periods of the Plan period as larger strategic sites navigate their way through the planning process.</p> <p>7. Enable a productive, clean and inclusive economy.</p> <p>3.28 We are generally supportive of this priority and are especially supportive of the need to enhance digital connectivity across the area in light of shifting working patterns as a result of the pandemic.</p>	

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	<p>8. Achieving sustainable travel and transport.</p> <p>3.29 Page 47 of the Consultation Document provides a useful summary of travel to work patterns and the level of self-containment (in this context defined by the percentage of people who live and work in the same area) of certain parts of the District. What this illustrates is that not only does the North Fringe of Bristol benefit from high levels of self-containment, but also that it acts as a magnet for the wider South Gloucestershire area with significant levels of in-commuting from Avonmouth, Thornbury, Yate and the Eastern Fringe.</p> <p>3.30 Locating development in close proximity/with good transport access to the Northern Fringe will be important in securing the most sustainable patterns of travel across the District.</p> <p>9. Ensuring the timely and efficient provision of infrastructure to support growing communities.</p> <p>3.31 We support this priority and agree that it is essential that new and growing communities are supported by an appropriate level of infrastructure to maintain and enhance their general sustainability.</p> <p>3.32 The key, as we have touched on above, is ensuring that the scope and need to deliver this infrastructure does not constrain the timely delivery of housing. This can be achieved through the identification of appropriate and deliverable SDLs which are underpinned by an appropriate level of non-strategic growth at the rural villages.</p>	
Nicholas Small - Stagecoach West	<p>“Achieving sustainable travel and transport” is one of the key priorities. We agree this should be among the foremost, given the proportion of Carbon emissions associated with mobility, and the clear challenges meaningfully reducing these.</p> <p>This objective and the supporting points are all elements that the current and previous Plans have included within them, and reflect explicit and long-standing national policy. As is all-too-apparent, more sustainable patterns and choices of movement have as a general rule, not been the result. Mostly, and especially beyond the A4174, there has been an apparent reinforcement of trends towards car-dependency.</p> <p>We submit that this should come as no real surprise. This is because Plans have steered patterns of land use in ways that weakly consider the availability and potential of relevant and competitive sustainable travel choices, if in fact they genuinely do so at all. This was spectacularly exposed in the production of the Joint Spatial Plan.</p> <p>Virtually all development in South Gloucestershire, since the 1980's, including Bradley Stoke and Emersons Green, demonstrably accord with the starting principle stated to achieve this objective:</p> <p>“New growth should be in close proximity to existing or new key services and</p>	01 Mar 2021

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	<p>facilities, to create walkable and cycleable neighbourhoods.”</p> <p>Development on any significant scale will be designed around exactly these kinds of “neighbourhoods:” this has been planning orthodoxy since the first new towns were established in the late 1940's. Most recent and planned major development in the Plan area actually performs better than 15-minute neighbourhoods that are the current buzz-word – often they are actually 10-minute ones, based on a 1,400 dwelling catchment for a neighbourhood food store and a 1,200 dwellings catchment for a 2FE Primary School, which on the application of even a 35 - 40 average dwellings density places development within a 1,200m radius of a central hub.</p> <p>Existing travel behaviour destroys the conceit of “fifteen minute neighbourhoods,” attractive and simple though it is. They don't meaningfully reduce car-dependency, because car availability opens up a much richer and more attractive set of opportunities of all kinds. People will readily drive past local shops – and Schools and even jobs – because they are seeking better opportunities that could never realistically all be concentrated within a 15-minute walk or cycle ride – without reaching densities seen in Hong Kong, for example.</p> <p>Proximity on its own is a necessary but insufficient condition to support greatly more sustainable travel behaviour. It is necessary for attractive and relevant Public Transport choices to be readily available offering a much wider range of destinations to be opened up, that do not need a car because journeys are similarly competitive and seamless.</p> <p>This can only be achieved by orienting development to existing and future deliverable high-quality Public Transport corridors. This is fundamentally different than merely flexing or extending bus routes into developments on a reactive basis – though clearly there will be a time and a place for this.</p>	
Nick Woodward	whilst these priorities are important there needs to be a balance. We need to make the most of previously developed 'brownfield' sites rather than destroying even more greenfield sites which form an essential part of all our environment, wildlife and general well-being.	28 Feb 2021
Nicola Flack	See above, the priorities should not cause harm.	31 Jan 2021
Nicola O'Connell	no comment	27 Feb 2021
North Thornbury Landowners Consortium	None.	29 Apr 2021
Patrick Williams	1. The first priority is actually building what was committed to in the last Plan. The failure to complete this is unacceptable. Developers who do not build on allocated land but use as an asset only, should have their permission removed and passed to another builder. They also are not building enough 1 and 2 bed properties to give young people or those down sizing. The remaining sites not built on yet must have	09 Mar 2021

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	<p>these groups as a priority, not 4 and 5 bed properties that are the builders' priority to achieve profits, and not demand.</p> <p>2. The environment and protection of countryside has to be given the highest priority. Zone 1 and 2 Flood plain land identified must not be a target for any building, more respect must be given to the communities impacted as a fundamental principle.</p> <p>3. To reduce Carbon footprint building must be focused towards the current main centres, i.e. the Bristol fringes.</p> <p>4. The priority has to be to get the maximum out of Brownfield sites, including office and retail centres that are unlikely to be fully populated.</p> <p>5. Smaller and lower cost housing is also a priority, conversion of office and retail sites should be used for this wherever possible right across the region. Bristol has large areas where this will be possible.</p> <p>6. Review of the County's Hospital requirements after the closure of Frenchay.</p>	
Paula Evans - Rangeworthy Parish Council	No.	26 Feb 2021
Pauline and Richard Wilson	<p>1. Very important.</p> <p>2. If possible do not lose mature trees and hedges during new development.</p> <p>4. Should be headed: Creating and maintaining exceptional spaces.....</p> <p>5. This section is headed Planning for urban and rural development but does not really address rural development.</p> <p>6. Look after range of existing houses e.g. extensions mean houses are priced out of lower income families also merging of smaller properties should not be allowed. New low cost housing should not be available for purchase as second homes or for holiday lets.</p> <p>8. Sustainable travel and transport should also include employment opportunities near to new housing.</p>	25 Feb 2021
Persimmon Homes Severn Valley	<p>Please see attached document.</p> <p>3. Potential Priorities (Section 4):</p> <p>3.1 The Phase 1 consultation document identifies 9 'potential priorities' that it considers could shape the content and approaches in the new Local Plan. It is correctly recognised that these priorities do not operate in isolation, with the potential scope for these priorities to address more than one issue. By way of example, Priority 6 (Provide the right type and number of new homes) has the potential to support all the other priorities where new development is brought</p>	11 May 2021

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	<p>forward in locations that are or can be made sustainable.</p> <p>3.2 The Local Plan once adopted will be the ‘growth strategy’ for South Gloucestershire, therefore the identified priorities should be set in the context of facilitating sustainable patterns of development. It should do so in a way that not only addresses issues related to need and the overall quantum of development, but also supports the Plan in wider objectives, such as reducing the need to travel and providing high quality places and healthy lifestyle.</p> <p>3.3 It is noted that the 9 potential priorities are not specifically listed in order of priority/importance which is correct. However, the future growth strategy must respond to identified need, so there is a case to be made that delivering the right type and number of new homes should form the overarching objective. In turn, priorities are achieved as part of a growth strategy that seeks to deliver the correct quantum of development.</p> <p>3.4 We consider each ‘Potential Priority’ in turn.</p> <p>1. Pursue a Carbon neutral and resilient future in a changing climate.</p> <p>3.5 This priority reinforces the national agenda and is supported as a matter of principle. Greater clarity is required in terms of what implications such priorities have on individual development schemes, and also whether the objective of Carbon neutrality is a calculation that is taken overall, rather than a measure of the acceptability of individual growth locations. It is, however, important that in respect of this “Priority” the Plan is entirely consistent with, and does not attempt to exceed, the requirements set out in the Building Regulations.</p> <p>3.6 Requirements for zero-Carbon and energy efficient design and construction are also supported in principle, so long as the Local Plan is based on detailed considerations of the viability implications. This is considered necessary to ensure that growth requirements can be achieved during the Plan period.</p> <p>3.7 Low-Carbon and renewable energy generation, alongside increasing the resilience to Climate Change, are all important measures that the Local Plan will need to implement in order to respond positively to the declared climate emergency.</p> <p>2. Protect and enhance our environment.</p> <p>3.8 This priority replicates the obligations on Local Planning Authorities as set out in Sections 15 and 16 of the National Planning Policy Framework, therefore as priorities to inform the preparation of the New Local Plan, these are supported in principle.</p> <p>3.9 In achieving this priority, it should be recognised that in specific circumstances, new development can play an important role, through the delivery of improvements and enhancements to existing conditions.</p>	

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	<p>3.10 The Local Plan should avoid circumstances where blanket restrictions on development occur, in doing so ensuring that future locations for growth to meet identified need, are considered on their individual merit and their capacity to successfully respond to their specific circumstances, whilst supporting the overall aspiration of this potential priority.</p> <p>3. Development that promotes health and well-being.</p> <p>3.11 It is embedded within the social objective to sustainable development that health, social and cultural well-being is a function of the planning system. Access to usable and appropriate open/green space, alongside good quality residential amenity is an important component of this priority.</p> <p>3.12 There is no objection to this priority and, as part of the strategy for achieving this, the new Local Plan should recognise that development can ‘promote’ health and wellbeing, by directing growth to locations which are or can be made sustainable, thereby reducing the need to travel and maximising walking and cycling opportunities.</p> <p>3.13 It should also be recognised that development can support existing provision of open spaces, informal and formal sports etc.</p> <p>4. Creating exceptional places and spaces.</p> <p>3.14 High quality design and place-shaping principles, which respond to natural, built and historic assets and local character will provide the ability for the New Local Plan to deliver this priority.</p> <p>3.15 Reference within this priority to new communities to be designed to be walkable and cycleable neighbourhoods requires greater explanation. It is not clear what constitutes a ‘community’ and moreover, there is apparently no consideration of Public Transport accessibility and connectivity within this priority.</p> <p>3.16 There would be concern if a new development standard, premised on the specific requirement for walkable and cycleable neighbourhoods, is imposed without further justification, specifically in terms of how compliance with such a requirement is to be assessed.</p> <p>3.17 It is not clear what is meant by promoting ‘opportunities and life chances for all,’ nor how this can be measured as a deliverable outcome. Increasing the supply of housing, in sustainable locations, provides greater opportunities for individuals and different groups to be able to access suitable accommodation. This should be an overarching objective of the growth strategy, but there is some ambiguity as to what this priority means and how the growth strategy can respond positively to it.</p> <p>5. Planning for urban and rural areas.</p> <p>3.18 There is significant cross-over and interdependencies with this potential priority and that listed as priority number 6 (Provide the right type and number of</p>	

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	<p>new homes). It is only once the final quantum of new homes is identified will it be possible to determine whether the growth strategy and specific components of it will be sufficient to deliver this priority. In general terms this priority is considered to be appropriate as it reflects the urban focus/regeneration strategy as a sequentially prioritised approach.</p> <p>3.19 We believe that this Priority would benefit from specific reference to the need to release greenfield land for new homes if the housing need is to be met. Such a reference should also state the priority of identifying such sites in the most appropriate and sustainable locations with access to a wide range of services and facilities.</p> <p>6. Provide the right type and number of new homes.</p> <p>3.20 It should be the overarching objective of the New Local Plan to ensure that sufficient sites are identified to accommodate the LHNA. As part of this process, the extent to which individual site options provide for sustainable patterns of development, support the wider strategic objectives and facilitate the delivery of the identified priorities should be determined.</p> <p>3.21 The scale of growth to be planned for should be sufficient to address locally derived housing need for South Gloucestershire, but also any unmet need arising from neighbouring Authorities, specifically Bristol. Where growth is required to meet the needs of a neighbouring Authority, the strategy should be to locate such growth as close as possible to where that need is arising. Proximity of the origin of particular needs, does not necessarily mean physical proximity, although this is clearly an obvious indicator of successfully addressing need close to source, but it can also mean proximity in terms of accessibility and connectivity, which may mean development is slightly further afield, but remains well connected and related to where that need is arising. Clearly, in considering proximity, the level of environmental impact is also a key consideration.</p> <p>3.22 We strongly support a growth strategy which provides for a portfolio of sites, both in terms of size and location. In doing so, this provides greater certainty and resilience to the supply of new homes, not just for the purposes of maintaining a five year housing land supply, but throughout the Plan period.</p> <p>3.23 As referenced in paragraph 2.36 above, we support the principle established in NPPF paragraph 72 that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, including significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. We believe that Land East of Chipping Sodbury complies with this approach and would ask the Council to share this view.</p> <p>7. Enable a productive, clean and inclusive economy.</p> <p>3.24 The general emphasis of this potential priority is supported given the need to ensure that the new Local Plan responds positively as part of the recovery from the</p>	

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	<p data-bbox="339 288 549 322">Covid-19 impact.</p> <p data-bbox="339 360 1318 602">3.25 Supporting the economic growth strategy will require sufficient employment sites both in terms of size and location, which such sites being sufficiently flexible to respond to the changing economic climate and facilitate new investment and innovation in the economy. Alongside space for businesses to grow, thrive and invest, it is essential that there is a sufficient skilled workforce available and that opportunities for job/economic growth are accessible to residents and potential workforce within South Gloucestershire.</p> <p data-bbox="339 640 1326 815">3.26 It is noted that within this potential priority there is reference to the need to safeguard employment land and jobs to meet identified needs and this is supported. The new Local Plan must achieve a sustainable balance in terms of maintaining/safeguarding sufficient employment land, against the pressures for such land to be brought forward for residential development.</p> <p data-bbox="339 853 1334 1128">3.27 To some extent there is a conflict between this potential priority and that of planning for urban and rural areas, with the emphasis on ‘optimising’ Brownfield land. It is therefore essential that the New Local Plan considers carefully the use of Brownfield land for residential growth, specifically in terms of the potential for this to undermine the wider economic strategy. Understanding and achieving this balance in respect of Brownfield/regeneration sites, will be an important part of the Plan-making process as it will determine what scale of residential development can be achieved on such sites without adversely impacting the wider economic strategy.</p> <p data-bbox="339 1167 876 1200">8. Achieving sustainable transport and travel.</p> <p data-bbox="339 1238 1337 1447">3.28 This priority should ensure that new development is accommodated in locations that are accessible and well connected to existing services, facilities and employment and is therefore supported as a matter of principle. The emphasis of any growth strategy should be to direct growth to locations that are well serviced by existing Public Transport or locations where enhancements to existing provision provides the opportunities to maximise Public Transport use.</p> <p data-bbox="339 1485 1337 1832">3.29 Existing growth areas, such as Yate/Chipping Sodbury represent clearly sustainable locations for future growth. Page 48 of the New Plan, for example, identifies Yate as being one of the urban areas that have “the greatest number and range of key services and facilities in close proximity to enable walking and cycling access.” The close physical and functional relationship between Chipping Sodbury and Yate means that it is logical that Chipping Sodbury also benefits from this accessibility. This is already recognised in the Phase 1 document including at page 107 where it is noted that Yate Town Centre provides a “very good” range of shops and that it is It is “well located to provide for its local community, and also serves the surrounding rural areas and Chipping Sodbury.”</p> <p data-bbox="339 1870 1337 2009">3.30 Notwithstanding its excellent connectivity to Yate, it should be recognised that Chipping Sodbury represents a sustainable location for new development in its own right. Further, the Land East of Chipping Sodbury is sustainably located within the settlement to access the facilities within the Town. For example, Chipping</p>	

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	<p>Sodbury School, a mixed 11 - 18 comprehensive is within convenient walking distance of the site as are the retail and employment opportunities within the town.</p> <p>3.31 In addition, Chipping Sodbury is well served by Public Transport connections including:</p> <p>? Y1 – Bristol – Yate – Chipping Sodbury via Coalpit Heath and the M32.</p> <p>? Y2 – Bristol – Yate – Chipping Sodbury via Coalpit Heath, Downend and Fishponds.</p> <p>? Y5 – Bristol – Yate – Chipping Sodbury via Westerleigh, Pucklechurch, Mangotsfield and Staple Hill.</p> <p>? Y6 – Southmead Hospital – Yate – Chipping Sodbury via Frampton Cotterell, Winterbourne, Bristol Parkway and Cribbs Causeway.</p> <p>? Service 84 has stops immediately adjacent to the site and provides a frequent service to/from Yate.</p> <p>3.32 The above services offer approximately a 50 minute journey from Chipping Sodbury to Bristol’s centre which then provides connections to local and national bus and coach services. The services also provide a 1 hour link to Southmead Hospital. All services offer a 6 minute bus journey from Chipping Sodbury to Yate where there are connections via Yate train station to the greater train network and where there are also a host of offerings in terms of services and facilities.</p> <p>3.33 We would also point out that Land East of Chipping Sodbury offers the opportunity to provide a mix of uses in addition to new homes. Potential exists, for example to provide for a new Primary School as well as commercial, recreations and community facilities as part of the proposals which will benefit existing as well as new residents.</p> <p>3.34 It should be noted that the Inspector presiding over the Examination of the (now) adopted Core Strategy noted that “a mixed use scheme in this location offers similar opportunities.... to increase self-containment of the settlement” (Inspector’s Report on the South Gloucestershire Core Strategy (November 2013) - paragraph 127).</p> <p>9. Ensuring the timely and effective provision of infrastructure to support growing communities.</p> <p>3.35 This potential priority is supported in terms of its emphasis on achieving sustainable patterns of development. In identifying land/sites to meet identified needs, opportunities to bring forward development which can utilise existing infrastructure should form the starting point for any growth strategy.</p> <p>3.36 Where new development is dependent upon new infrastructure, this should be considered in the context of viability and any burdens placed on specific</p>	

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	<p>development sites/locations should be proportionate to their impact.</p> <p>3.37 Whilst we recognise concerns set out in the consultation documents that large strategic sites are often dependent upon delivering significant up-front infrastructure which can result in unexpected delays, this is not necessarily a given. Not all strategic sites require significant up-front infrastructure from “Day 1” and appropriate phasing of development can also play a key role. We would very much like the opportunity to discuss with the Authority how the land East of Chipping Sodbury could be delivered.</p>	
Pete Connors	<p>I don't think that there is a pressing need to review the Green Belt if that means reduce it as I think that where this has not been eaten into it has gone a long way to preserve the heritage and identities of particular areas such as in my own area, Coalpit Heath.</p> <p>Any review must be done with great care and must pay careful attention to the provision off an effective road, health and education infrastructure and public transport which is cheap and effective.</p> <p>I also think the housing targets need to be critically reviewed in the light of Brexit, reduced immigration and an anticipated downturn in the economy post COVID. Put simply where will the demand for new houses come from now?</p>	28 Feb 2021
Peter Box	<p>Whilst I have no objection to the exhaustive list of potential priorities, I feel that there should be an indication or actual priorities within this list: i.e. achieving carbon neutral homes and desecrating greenfield sites before ALL brown field opportunities have been exhausted, should be given maximum priority.</p>	23 Feb 2021
Peter Rawlinson - Gleeson Strategic Land	<p>The priorities of the Plan will also need to be aligned to the overarching policies and strategy in the West of England Spatial Development Strategy.</p>	10 Mar 2021
Progress Land Ltd	<p>Many of the priorities would align to and support provision of growth through the allocation of new settlements in the form of garden villages, such as land at Sycamores. Provision of a garden village in this location would help protect the Green Belt concept, develop greenfield land of the lowest value, in lowest category flood zone (sequential), by its nature promote healthy living and well-being and create exceptional places to live and spaces.</p> <p>Furthermore, it is an appropriate location to deliver a walkable and cycleable neighbourhood (priority 4) with a new settlement planned from scratch and can support sustainable travel as indicated by Stagecoach by supporting and linking to A38 bus links.</p> <p>A priority for South Gloucestershire should therefore be to create a new settlement in the form of a garden village/town first to ensure sufficient land for housing and employment is identified and then, if necessary, a review of the Green Belt can be undertaken to determine how much land is required and whether parts should be released for development.</p> <p>Priority 9 - Ensuring the timely and efficient provision of infrastructure to support growing communities (p. 58):</p>	11 May 2021

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	<p>Firstly, please refer to our comments on Issue 45 above.</p> <p>With particular reference for the first bullet under Priority 9 (i.e. Direct development to those locations well-served or capable of being well served by infrastructure including utilities, key services and facilities and Public Transport in a cost effective and efficient manner), it is view that my client’s site at Sycamores, in conjunction with the adjacent site at Buckover, would be an appropriate location to direct development to on the basis that its location and scale would allow all manner of infrastructure provision to be dealt with in a ‘cost effective and efficient manner.’</p> <p>The available evidence suggests that an expansion of the Buckover Garden Village would contribute to the sustainability of that development, and that the additional travel demand outside of the development itself might feasibly be accommodated by the infrastructure schemes that were already identified within the former JSP. This approach was endorsed by Stagecoach.</p>	
R. Brown	<p>Carbon neutral & resilient future Facilities for walking and cycling are good but this is only suitable for a limited section of the community. This would not be practical for the elderly and young or large families. Good public and personal transport is still a needed.</p> <p>Protect & enhance our environment Tree lined streets would be a welcome addition for new development.</p> <p>Provide the right type & number of new homes With the evolution of employment moving to home working & creating a better work/life balance with flexible working, new homes will need to be designed with this in mind. i.e. home office space/room. This will affect where houses need to be. South Glos appears to be taking an unfair share of the demand as was agreed in the previous JSP proposal.</p> <p>Ensuring the timely & efficient provision of infrastructure to support growing communities This is a seriously important issue. The necessary services and facilities must be provided at the right time so as not to overload the existing services that are already struggling to provide an adequate service. It is all too common for developers to fail to provide these needs for the communities. The facilities must be provided in proportion to the growth of the community.</p>	25 Feb 2021
Rachel Beard	<p>Planning for Urban and Rural areas This priority does not reflect the need to protect our natural, built, historic and landscape assets. The Bristol and Bath green green belt should not be considered for buiding on and the need to protect the greenbelt spaces around Thornbury should be a prority.</p>	28 Feb 2021
Rebecca Woodward	<p>These priorities are important but need to be balanced. We need to make the most of the land that has already been developed previously rather than destroying more green spaces essential for the environment, wildlife and well being.</p>	28 Feb 2021

Respondent Name	User Response: Text	Response Created
Redcliffe Homes	<p>Many Local Plans list priorities but these are seldom carried through into a robust Local Plan which sets out clear policies and proposals for the 20 year period. It is extremely easy to provide a list of priorities but the important part for the Plan is that it is robust, can respond to potential changes during the Plan Period and ultimately delivers.</p> <p>Unfortunately, this has not happened previously in the District and lessons need to be learned.</p>	04 Mar 2021
Redcliffe Homes	Please see enclosed representations.	01 Jun 2021
Redrow Homes (SW)	Please see enclosed representations.	29 Apr 2021
Richard Bentham	Please promote motorcycles as a mode of efficient, low pollution, less congested commuting. Your plan mentions them twice. Not good enough! Provide secure parking & promote awareness with roadside poster campaign. Your report often states the commuting/shopping distances are too far or difficult to walk. Cycling is suitable for some people travelling a few miles. Not everyone is able to cycle.	26 Jan 2021
Richard Lloyd	<p>It is also important to consider prioritisation in relation to the 55 issues set out in Section 3. Of the groups of issues, my view is that getting policies right for issues 22 to 26 (Planning for urban and rural areas) is of overriding importance. In considering each of these issues, it is imperative to ensure that new development is in truly sustainable locations minimising the distance needed to travel for work and to access shops and services, reducing car mileage, supported with good, reliable and affordable public transport links and better provision to encourage active travel.</p> <p>All the potential priorities are important. Critical recurring themes include: minimising the need to travel, decarbonising travel through prioritising public transport and active travel and ensuring that new development is confined to sustainable locations (also see the above paragraph); improving digital connectivity; avoiding damage to environmental assets and enhancing them wherever possible; delivering urban regeneration; creating high quality developments in all respects; and meeting local needs housing.</p>	03 Mar 2021
Richard Pendlebury - Anchor Society	<p>Development that promotes health and well-being</p> <p>At the heart of this issue is the need to enhance local communities. There is something about resilience here. Often development occurs without enough community infrastructure - space for people to meet (in post Covid times) is essential.</p>	22 Feb 2021
Richard Walker - Lightwood Strategic	<p>Priority 1:</p> <p>Priority 1 is to 'pursue a Carbon neutral and resilient future in changing climate.' Our comments on Climate Change in Section 3 above suggest the Council should be adopting a methodology that ensures that the Carbon credentials of Spatial Strategy and site alternatives are measurable to enable planning judgments to be made based on insightful data.</p>	01 Jun 2021

Respondent Name	User Response: Text	Response Created
	<p>Such a methodology will show that whatever you do to Charfield (open a railway station, with a limited service, achieving limited modal shift) or Buckover (extending MetroBus all the way out to Thornbury and hoping for some actual rather than planned on-site jobs generation) that these locations, will generate the highest of residual tailpipe Carbon emissions per trip relative to locations closer to the urban fringe of Bristol. These other locations may be in the Green Belt, but if a Climate Emergency and a 2030 target is not an exceptional circumstance to pursue a Green Belt focused strategy (due its Carbon credentials) then what is?</p> <p>Due to the level of housing that the Council will need to accommodate, including meeting needs that derive from but which cannot be delivered within Bristol’s administrative area, it may be the case that less sustainable locations are needed in any case, but these should drop in at the end of the Spatial Strategy/site selection process from a Carbon reduction perspective.</p> <p>Priority 6:</p> <p>Priority 6 concerns housing. The Council understands that a diverse range of sites re size and locations will be needed. There is a spectrum of sustainability which guides the appropriate level of development to different places on that spectrum. The need to assess this properly and fully is acute given the Council’s declared Climate Emergency, which we assume is the overarching no.1 priority.</p> <p>Providing resistance to 5-year land supply is an interesting phrase, but one that we support. We observe so many instances whereby a Plan only has one Plan (Plan A, including an initial 5% or 20% 5-year supply buffer) and if this fails to deliver then the only recourse to its correction is for the Council (or PINS) to permit sites on unallocated land or Plan review (which takes forever and is not a responsive ‘response’). Where the only sustainable supplementary land supply options left are in Green Belt then ‘lockdown,’ ensures until Plan review. Off Plan permissions don’t equate to bad development, but the LPA loses control and cumulative effects are harder to manage.</p> <p>The word ‘speculative’ is used several times in the consultation document. This shows that the Council does not enjoy losing control. Embedding ‘Plan B’ sites that are the first to be released enables control to be retained if the ‘Plan A’ housing trajectory falter. Sites can be identified or have policy requirements ascribed to them, including triggers for their release. Of course, some options may currently be in the Green Belt and thus the Council would have to do more than safeguard these sites for development beyond the Plan period. They would need to be removed from the Green Belt on the adoption of the Plan. The failed High Court challenge on the Guildford Local Plan shows that LPAs can justify Green Belt release where this result is quite a large surplus against the baseline minimum need for development.</p>	
Robert Harris - Olveston Parish Council	The priorities identified would appear to be of equal, or near equal, importance to the whole picture and it will therefore be critical that certain recurring themes e.g., diversity of housing needs, need for and type of travel, environmental harm, sustainability etc. are carefully considered in each of the priorities.	26 Feb 2021

Respondent Name	User Response: Text	Response Created
Robert Hitchins Ltd	<p>Please see enclosed submission.</p> <p>Whilst we support the Council’s approach to optimising future development on Brownfield sites in line with pursuing an ‘Urban Lifestyles’ approach. In accordance with Paragraph 118 of the NPPF for the New Local Plan to be sound the Council’s ambition to prioritise growth in urban areas should form part of a strategy which is supplemented by the inclusion of greenfield sites which are otherwise sustainably located adjacent to existing settlements, strategic employment facilities and established transport infrastructure. The inclusion of such sites would effectively integrate new development at sustainable locations throughout the region whilst also helping to ensure the Council do not pursue an approach which is potentially over-reliant on the delivery of Brownfield sites given their associated complexities.</p> <p>In addition to the above, we would also note that there could be merit in establishing clearer connections between the importance of looking at the location of new homes and new jobs within the Plan area. In this regard, Pilning is well-placed close to the Avonmouth and Severnside Enterprise Area (ASEA), which is recognised as a regionally important employment facility and as part of the recent Great Western Freeport bid (as submitted by WECA) is projected to facilitate significant economic growth throughout the region.</p>	01 Jun 2021
Robert Hitchins Ltd and Harrow Estates PLC	<p>Please see enclosed submission.</p> <p>In response to Priority 6 “provide the right type and number of new homes” we would add the following comments:</p> <ul style="list-style-type: none"> • The emerging Local Plan will indeed need to meet the development requirements of the SDS including housing needs that cannot be met in Bristol. For the overall soundness of the Plan, it will also be important that the Council consider exceptional circumstances for removing land from the Green Belt in order to accommodate sustainable development. • It is right to identify that a “portfolio” of sites will be needed. This must not include an over reliance on Brownfield sites and should recognise the need to allocate suitable greenfield land. A Green Belt review will be needed to accommodate sustainable development. • As part of any Green Belt review it will be important to recognise that Easter Compton offers the opportunity to accommodate sustainable development and that our clients’ land does not make a significant contribution to the purposes of that designation when compared to other alternatives. 	01 Jun 2021
Robert Keen - Elms NHW	More attention needed to environmental issues	23 Feb 2021
Robin Perry	<p>Priority should be given to correct the current problems before building further housing.</p> <p>Infrastructure to support addition housing must come before more housing.</p> <p>All issues associated with decarbonising should be resolved before building any new structure.</p>	21 Feb 2021

Respondent Name	User Response: Text	Response Created
	Any new housing built should be carbon neutral from now. Solar panels, EV charge points, heat pumps etc. should be a mandatory requirement for any new housing from now. This obviously needs to happen and cannot wait.	
Roger Hall	See TRAPP'D response.	25 Feb 2021
Rosalyn Pyle	<p>4. Priorities</p> <p>I agree with the potential priorities in principle. However, with the Government due to make significant changes in planning system whereby Housing Development Companies will be given more powers, how will it be possible to ensure these priorities are met?</p> <p>4. Creating exceptional places and spaces.</p> <p>I live near Warmley – I am disappointed to read that while acknowledging the numerous historic buildings and sites in the area, the Local Plan described it as ‘having issues with a lack of interpretation/tourist facilities, neglect, decay and redevelopment that may affect these heritage assets. I have been a member of 2 voluntary groups (Friends of Siston’s Commons and Warmley Signal Box and Community Garden Group) for more than 10 years and have lived in the Parish of Siston for most of my life. Unfortunately, our group has been disappointed in South Gloucestershire Council’s lack of interest and engagement in relation to these valued community assets which are an important part of our local heritage. Maintenance of both these valuable community resources has been provided as a result of grant applications – very little input and support from the local authorities. We have, however, been supported and encouraged by our Parish Council Members. A sceptic might consider that your Local Plan is painting the picture that this area is in need of investment and redevelopment in order to enhance and uplift it. This is simply not true.</p> <p>The A420 road which passes through Warmley is already heavily congested due to the volume of traffic passing through. With recent mass development in nearby Lyde Green and Emersons Green, volume of traffic has increased across the entire area. This infrastructure would not be able to cope with an urban extension as the Ring Road is already overcrowded and congested at peak times. For this reason, Warmley has been declared an Air Quality Management Area.</p>	28 Feb 2021
Roy Irwin	<p>It is not possible to have that many priorities so again there needs to be clearer indication of what really matters.</p> <p>In protecting the natural environment why not extend the green belt, where the landscape quality is high, and it already contributes to Green infrastructure, and is adjacent to the current green belt in exchange for some of the green belt being utilised for development where it is of significantly lower quality.</p>	01 Mar 2021
Ruth Hall - Wessex Water	<p>Priority 1 Pursue a carbon neutral and resilient future in a changing climate</p> <p>As commented above under Issue 1, the carbon impact of providing sewerage infrastructure should be considered when evaluating different development options.</p> <p>Priority 3 Development that promotes health and well-being</p> <p>Ensuring high quality residential amenity should include avoiding development in locations likely to be adversely affected by the operation of sewage treatment and sewage pumping. Potential sources of nuisance include that from odour, vibration, noise and flies. The locations of planned development should be such that buffer</p>	02 Mar 2021

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	zones around Sewage Treatment Works and Sewage Pumping Stations are maintained to minimise conflict with surrounding land uses and amenity issues.	
Sam Scott - South Glos Labour Group of Councillors	Page 56 – one of the 9 priorities is development that promotes health and wellbeing but there is no mention here of how affordable social housing promotes health and wellbeing, although the plan does mention affordable housing on the next page - page 57 when it talks about providing the right types and numbers of new houses. You need to make it clearer that there is a proven link between good quality affordable social housing and health and wellbeing. There is also a distinction to be made between affordable housing (usually home ownership) and social housing (usually rented).	02 Mar 2021
Sarah Hardcastle - Friends of Ridge Wood	Agree with prioritising climate change mitigation and environmental protection at all stages of the plan.	28 Feb 2021
Sean and Jacqueline Rinaldi	The 9 priorities listed are mostly valid, but not of equal weight. If these priorities are to be used as criteria for selecting candidate locations for development, they must be given weighted scores, not used as a simple tick list.	26 Mar 2021
Simon Fitton - YTL Developments (UK) Ltd	<p>YTL agrees with the 9 potential priorities; these will create a robust framework to deliver sustainable policies through the preparation of the Local Plan. Development at the former Filton Airfield can make a vital contribution towards the achievement of those priorities. Its previously developed status in the heart of the North Fringe, coupled with the scale of development capable of being achieved means that it is uniquely placed to contribute to the creation of an exceptional place and facilitate transformational change.</p> <p>YTL supports the need to differentiate between rural and urban areas through the preparation of robust policies that acknowledge the obvious differences between what is required in terms of, inter alia private amenity, parking and public open space standards. A ‘one size fits all’ approach across the District will not deliver the outcomes SGC is seeking.</p>	16 Mar 2021
Simon Moore	Reinforce the overarching need to protect our natural environment from further degradation, preserve agricultural land from any form of development and ensuring a carbon neutral future by a specific date.	28 Feb 2021
Simon Steele-Perkins - Waddeton Park Limited	<p>Priorities is an odd term as it implies a ‘pecking order,’ but as presented (and rightly) there is no apparent hierarchical approach. The ‘priorities’ appear to cover everything in any case, and it is not clear that there is any real difference between these and the previously stated ‘issues.’</p> <p>There does however seem to be the opportunity for a shorter, differently structured, and perhaps more accessible and more easily responded-to consultation.</p> <p>Because of our particular interests we note the ‘priority’ relating to Green Belt, which is presented at 5(4) under ‘Planning for urban and rural areas,’ when it is probably a matter in itself given the enormous weight the Council has previously given Green Belt in its spatial planning work.</p> <p>The priority is qualified as ‘If the Bristol Green Belt is reviewed……,’ which is a</p>	06 May 2021

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	<p>little disingenuous when the Council knows that the Green Belt has to be reviewed and will almost certainly be changed as a consequence – as it certainly should be. This should be made clear.</p> <p>The reference to recreational value is misleading too, as whilst the recreational value of much open land should be increased where (critically) there can be public access, there is no actual relationship between recreational use and value and the designation of land as Green Belt.</p>	
<p>Sophie Spencer - CPRE Avon and Bristol [South Gloucestershire District]</p>	<p>The list although comprehensive should be weighted, not all are of equal importance some are essential or impact significantly on others.</p> <p>Priority 1. Effective transport is difficult to achieve, it must be:</p> <ul style="list-style-type: none"> • dependable • attractive and affordable for the user • affordable to S Gloucs • profitable • sustainable <p>Buses travelling on congested routes are not dependable, therefore there is no incentive to use them over an above a private car. The concept of MetroBus as expressed in the JTS, was that it would run on exclusive routes or in dedicated lanes. This has not been delivered, new roads have been constructed without congestion free routes.</p> <p>Previous consultations opined that the user judged attraction and affordability by comparison with alternatives and in respect of the private car, some form of penalty would be necessary to encourage the switch. Bus only and segregated cycle lanes work but recently where the impact on the motorist has proved severe, they have quickly been abandoned. Other urban areas have introduced workplace parking and congestion charges, but the political geography of the West of England creates a difficulty in that what might assist one authority is likely to affect the politics of another. It also impacts the poor more than the affluent.</p> <p>Priority 2. As we argue elsewhere, the high proportion of S Gloucs that is Green Belt or AONB warrants a reduction in the housing target and increasing housing density in all locations. We think a blanket ban on high flood risk areas if it excludes developed areas that warrant continuing protection, is wrong.</p> <p>Priority 3. Who could argue against this list of aspirations? But, elsewhere in the Plan matters essential to achieving the stated goals are wholly beyond S Glouc’s powers and others like employment rely on input from others. If the assured means of attaining any target cannot be defined and progress towards it measured, it should not be included. Instead, the effect of its absence must be evaluated and catered for.</p> <p>Priority 4. The comments for Priority 3 apply. We have oft seen developments met with</p>	<p>02 Mar 2021</p>

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	<p>statements about not repeating the mistakes of the past. The use of local materials, better layouts, closer to amenities have been promised only to fail when adjudged by developers to be beyond the market price.</p> <p>Priority 5. The need to optimise density is not restricted to urban areas and brownfield sites, allowing low density in other areas adds to our acute problems. Young and old can be best served by sensitively designed higher density homes, be it in urban or rural communities.</p> <p>All the many reviews that have occurred over the last half century to the S Glouc's portion of the Green Belt have diminished its ability to achieve the long-term purpose. Greater Bristol has advanced North, West and East creating dormitory settlements, increased dependence on the private car and pollution. If the expressed belief is real, further loss cannot be entertained.</p> <p>Priority 6. The ability of WECA to enforce an area wide housing need is to be removed, leaving S Gloucs free to plan its need and given the difficulties of protecting the Green Belt and the Cotswold AONB, we expect it to be well below the level calculated in Issue 27.</p> <p>The pressing need is not for just more houses it is for more truly affordable houses. Although recognised this has not been implemented, in Question 3 we commented upon the woeful overall performance. Less than 3 months after the Council adopted Core Strategy 18, it was removed for Application PT14/0565/O. Paragraph 6 of the accompanying Affordable Housing Statement, "The Supplementary Planning Document re-states that 35% of the dwellings on the application site should be affordable. The Council does not wish to jeopardise the overall delivery of housing in S Gloucs and, consequently will have regard to the economic viability...". How ironic that 6 years later this site has yet to contribute to the desired outcome.</p> <p>Events since the adoption of the Core Strategy have shown that resilience to a five-year supply cannot be attained by granting ample planning approvals.</p> <p>Priority 7. We refer to our earlier comments on the impermanence of safeguarding. By building in the green areas S Gloucs threatens one of the main drivers for tourism.</p> <p>Priorities 8 & 9. Under this priority future development in remote and poorly provisioned places like Charfield and Wickwar will be non-compliant. It is not sufficient to base any judgement on the basis that a development is 'capable of being well served', this approach has created the problem. The infrastructure must either exist or be fully designed and funded.</p> <p>Housing developments are cash flow negative, borrowing to fund infrastructure increases house prices and reduces profitability. Bradley Stoke funded by the</p>	

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	builders, was for many years devoid of shops, schools, and leisure facilities. In other countries when an area is designated for development the State builds the infrastructure. Is this what is envisaged?	
South West Housing Association Planning Consortium (HAPC)	<p>Potential Priority 6: Provide the right type and number of new homes:</p> <p>The revised NPPF (2019) introduced significant changes in how the Council will look to assess the need for affordable housing, including the size, type and mix of affordable housing to meet local needs within different areas of the Borough. It is important that the up-to-date definition for affordable housing is used during the production of a new evidence base for the emerging Local Plan, which may also underpin the SDS.</p> <p>Given the acute affordable housing need in South Gloucestershire, we encourage the Council to set ambitious targets to increase affordable housing delivery across the Authority. Providing a separate target in the Local Plan solely for the delivery of affordable housing is a useful planning measure and should include a review mechanism to ensure that if the target is not being met that appropriate action is taken to bring forward development of more affordable housing. This should be considered alongside measures set out in the NPPF and PPG in order to be effective.</p>	14 May 2021
South West Strategic Developments (SWSD)	<p>Please see enclosed representations.</p> <p>8.3 Whilst we agree with the priorities set out we feel that SGC should prioritise and streamline these further in the next stage of the Plan process. It should also be recognised that some of the priorities and their objectives are likely to conflict with one another and SGC therefore need to make a decision about which issues are more important than others.</p> <p>8.4 In our view, the priorities should focus on achieving sustainable travel and transport; enabling a productive, clean and inclusive economy in light of COVID-19; and providing the right type and number of new homes for the Authority area in the areas where demand is highest and sustainable patterns of transport can be engendered.</p>	31 Mar 2021
Spitfire Bespoke Homes Ltd	<p>3.2. Section 3 of the consultation document identifies 55 issues which the new Local Plan proposes to consider and Section 4 sets out the potential priorities for the Plan which will inform the way growth is planned for in South Gloucestershire and future planning policies.</p> <p>3.3. In principle, Spitfire would like to highlight its support for the 55 Issues and 9 priorities proposed, particularly in respect of Issue 24 (Green Belt), Issue 26 (Growth in rural villages and settlements) and Issue 32 (Issues with housing delivery on large scale sites). In this regard, we would reiterate that the preparation of the Plan must be mindful of opportunities to promote sustainable development in rural settlements and villages, such as Winterbourne, enabling them to “grow and thrive, especially where this will support local services,” as set out at paragraph 78 of the NPPF.</p>	21 Apr 2021
St. Modwen	All of these priorities are necessary to deliver high quality and sustainable	05 Mar

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Developments and The Tortworth Estate	<p>development and they give a high-level idea of how the issues in the previous section would be addressed.</p> <p>If there was to be one “key priority” that presides over all the others we suggest it would be Pursue a Carbon neutral and resilient future in a changing climate as this sits across all of the other potential priorities in one way or another. For example:</p> <ul style="list-style-type: none"> - Priority 2: Enhancing Biodiversity and increasing tree planting has climatic benefits. - Priority 3: enabling healthy/active lifestyles may help reduce car travel, reducing Carbon emissions. - Priority 4: Designing new development to meet stringent environmental/ sustainability requirements will reduce Carbon emissions, while walkable neighbourhoods will reduce the need to travel. - Priorities 5 and 6 – locating the right development in the right places, supported by appropriate infrastructure should reduce reliance on the private car for journeys. - Priority 6 – Seeking to achieving “green” economic growth is all about reducing Carbon emissions and embracing sustainable growth and development. <p>In terms of incorporating these priorities into new development, the proposed Buckover Garden Village is being designed with a focus of delivering against all these priorities, as many align with Garden Village principles. A full package of supporting information has been provided within our recent Submission to the Call for Sites exercise.</p>	2021
Stephen Hickmans	<p>Priority must be given to the protection of green belt and endangered wild life. Once lost it is gone forever</p>	26 Jan 2021
Steven Freke	<p>The priorities must be capable of being measured and progress reported. Plans and reports in the past have said the same things but we see continued development sprawl in our Towns and villages that contradicts the plan but this is ignored. Progress against priorities should be measured and reported annually to ensure the plan is being adhered to.</p>	27 Feb 2021
Steve Seward	<p>It is important that priorities should be focused on the recognition of a limited available land area, respecting Green Belt zones as if they are already developed and avoiding over population which will affect the lifestyles of existing residents</p>	13 Feb 2021
Strongvox Homes	<p>1. Pursue and Carbon neutral and resilient future in a changing climate:</p> <p>3.2 Climate Change is rightly identified as a key issue that the Local Plan should seek to address and Strongvox Homes are wholeheartedly supportive of the Council's ambitions to achieve Carbon neutrality by 2030.</p> <p>3.3 With regard to Housing Delivery, we agree that it is important for new development to support the de-carbonisation of transport to minimise usage of the private motor vehicle and maximise opportunities for walking and cycling. It will</p>	11 May 2021

Respondent Name	User Response: Text	Response Created
	<p>be imperative to locate development where access to existing or new services, facilities, employment opportunities and Public Transport are/will be strong.</p> <p>3.4 Furthermore, the advent of electric vehicles and increased levels of home-working are not reasons that would justify a departure from this approach. This is because there are significant economic and social benefits to ensuring that people can access the above through a variety of means.</p> <p>3.5 However, one also needs to be realistic in acknowledging individual travel patterns and behaviours will still mean additional vehicular journeys will be required. This can be mitigated by ensuring that where vehicular journeys will be made, the relative distance required to access services, facilities and employment opportunities are minimised. This would, naturally, support development at existing key settlements and areas with good access to Central Bristol and its urban fringes. Yate is both an existing key settlement which benefits from a significant level of service provision and will benefit from enhanced rail and bus connections to/from Bristol, making it one of the premier locations for growth in the new Local Plan.</p> <p>3.6 That said, maximising the potential for sustainable patterns of development will only go so far. A significant contributor to emissions is energy consumption within individual dwellings and, as a result, Strongvox Homes also support a requirement for higher energy efficiency standards to minimise energy demand. We note that the Government has now withdrawn its intention to restrict Councils' ability to set higher energy performance standards than those prescribed in the Building Regulations. As such, we would support an approach which sought to achieve a higher standard than would otherwise be imposed at a national level.</p> <p>3.7 Furthermore, the Government are still pursuing their Future Homes Standard which will require all new homes to be highly efficient with low Carbon heating and zero Carbon ready by 2025. Requiring all new homes to be Carbon neutral upon the Plan's adoption would not be such a significant step up from what will, ultimately, be the status quo moving forward and so we would support this approach.</p> <p>2. Protect and enhance our environment:</p> <p>3.8 The Environment is the next identified theme and, again, Strongvox Homes are entirely supportive of the need to ensure that development leads to a betterment of the District's Biodiversity and Green Infrastructure assets and should seek to exceed identified standards where possible.</p> <p>3.9 The supporting Vision Document for sets out how Biodiversity Net Gains and a robust Green Infrastructure network would be delivered.</p> <p>3. Development that promotes health and well-being:</p> <p>3.10 Again, we are generally supportive of this priority and are committed to ensuring that high quality open space and active transport routes are provided on our sites to support play, walking, cycling and sport.</p>	

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	<p>4. Creating exceptional places and spaces:</p> <p>3.11 All development should aspire to secure the highest standards of urban design and so Strongvox fully support the need for areas of growth to be legible, walkable and beautiful places to work, live and play.</p> <p>5. Planning for urban and rural areas:</p> <p>3.12 Naturally, we support any attempts to maximise the development potential within existing urban and rural settlements. However, we also welcome the acknowledgement that this will only go so far in meeting overall housing needs and that greenfield sites will be needed to meet the development needs of the District and other WECA members. We would note that this conclusion is also reached by the Sustainability Appraisal (SA).</p> <p>3.13 For reasons set out later in this document, we consider exceptional circumstances will exist to justify the removal of land from the Green Belt to support the Council's development needs. Where this is necessary, we wholeheartedly support the need to ensure that new boundaries are robust and defensible to improve its important function of restricting further urban sprawl. We also support the need to enhance its recreational value and would ensure that new areas of open space are integrated with walking and cycling routes to ensure the benefits accrue to both existing and future residents.</p> <p>3.14 We would note that the SA indicates that there will likely be significant sustainability benefits associated with the release of Green Belt land for development and that this should be explored through the Local Plan process.</p> <p>6. Provide the right type and number of new homes:</p> <p>3.15 We await the progression of the West of England SDS for further details on the housing requirement that will ultimately be adopted. The only thing we would note is that the Standard Method yields a slightly higher minimum annual requirement than the adopted Core Strategy (1,360 vs 1,412 dwellings per annum).</p> <p>3.16 We are also mindful that there has been a significant increase to Bristol's need following the revisions to the Standard Method (which has added around 830 dwellings to their annual requirement). Given the limited availability of land around Bristol, it is unlikely that it will be able to meet its previously predicted need, let alone this increased minimum requirement itself.</p> <p>3.17 Furthermore, constraints around Bath will likely limit the scope for it to accommodate some of Bristol's unmet need and so the onus will be on South Gloucestershire (and potentially North Somerset) to assist in meeting Bristol's unmet needs. As such, we would expect South Gloucestershire's minimum housing requirement be uplifted significantly from the standard method figure to account for this.</p>	

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	<p>3.18 It is also imperative that a significant proportion of this development is well related to the Bristol Urban Area given that it will be looking to meet the needs of residents who need to be functionally well related to it. This would support the delivery of development on important transport routes (MetroBus Routes or the local rail network) which are well related to the Bristol Urban Fringes (e.g. Yate).</p> <p>3.19 It will be important for progress to be made on the SDS and a joint position to be reached with North Somerset in order to understand how housing will need to be distributed across the region and allow for effective and viable options to be considered.</p> <p>3.20 We welcome the acknowledgement of the difficulties the Council has had with delivery in recent years and we would stress that the deliverability of any strategy should be a central guiding principle for the Plan. Large strategic sites will be essential to securing the overall housing requirement; however, they tend to have long lead in times, can have various complexities and often need to secure enabling infrastructure in advance of their delivery.</p> <p>3.21 The Council has had first-hand experience of this in recent years with delays to the Cribbs Patchway and East of Harry Stoke New Neighbourhoods being a key reason for their deficient housing land supply position. This has facilitated significant levels of speculative development at sites beyond the Green Belt and placed significant pressure on rural communities to make up the shortfall. Such development is not necessarily unsustainable, but it sits outside of the adopted Plan's overarching development framework which would otherwise secure a more socially, environmentally and economically sustainable outcome.</p> <p>3.22 That said, there is no hiding from the fact that larger strategic sites will be essential in meeting the Council's housing needs over the next Plan period and can deliver significant benefits through the utilisation of economies of scale and provide a steady supply of dwellings over a prolonged period of time.</p> <p>3.23 Consequently, it is imperative that the Council identify Strategic Development Locations with deliverability at the forefront of any considerations. Development locations that would require significant upfront enabling infrastructure should be carefully considered against alternative locations with less onerous requirements.</p> <p>3.24 Another important factor to consider is the relatively compressed timescale for the Local Plan and how this will affect the delivery of housing. The new Local Plan will cover a period of 15 years which is five years less than the JSP; however, the housing requirement has remained around the same level (c. 80,000 dwellings) for the WECA Authorities[1]. In simple terms, the WoE Authorities are going to have to plan for a similar amount of housing to the JSP in a shorter period of time.</p> <p>3.25 This compressed timescale also means that anticipated delivery from large strategic sites over the Plan period will be reduced, especially when one factors in lead in times and applies realistic trajectories to the delivery of housing[2]. The Phase 1 document has raised the importance of ensuring that the final strategy is deliverable and any slips to delivery on identified strategic sites could have serious</p>	

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	<p>consequences for the Council in demonstrating a deliverable supply of housing over the longer-term.</p> <p>3.26 The potential result is that a greater number of SDLs will need to be identified compared with the JSP to mitigate this risk, with the majority of these delivering housing beyond the end of the Plan period. The Local Plan will, therefore, need to take a longer-term view at this stage in the interests of ensuring the medium-term development needs of the District are met.</p> <p>3.27 Whilst this will necessitate a review of all of the JSP's SDLs and some may fall away (we have reservations in respect of Buckover Garden Village), land to the North/West of Yate is controlled by a small number of developers/promoters who are committed to bring the sites forward for development and are not reliant on the delivery of significant infrastructure before housing completions can start coming forward (albeit they would support the delivery of several strategic transport infrastructure interventions identified in the Joint Local Transport Plan).</p> <p>3.28 The technical work undertaken to date has confirmed that there are no substantive constraints to delivery on the site and could come forward as an early phase of development once land is released from the Green Belt. An early Hybrid Planning Application could be submitted to align with the emerging Local Plan's timetable so that permission could be granted shortly after its adoption and housing could be delivered shortly thereafter.</p> <p>[1] Albeit the distribution is more heavily weighted toward Bristol.</p> <p>[2] The often cited 'From Start to Finish' report by Lichfields should inform these assumptions.</p> <p>7. Enable a productive, clean and inclusive economy:</p> <p>3.29 We are generally supportive of this priority and are especially supportive of the need to enhance digital connectivity across the area in light of shifting working patterns as a result of the pandemic.</p> <p>8. Achieving sustainable travel and transport:</p> <p>3.30 Page 47 of the Consultation Document provides a useful summary of travel to work patterns and the level of self-containment (in this context defined by the percentage of people who live and work in the same area) of certain parts of the District. After the Bristol Urban Fringe, we note that Yate also benefits from strong levels of self-containment with 47% of the employed population working locally and relatively modest levels of out commuting to Central Bristol and its urban fringes.</p> <p>3.31 Given this level of self-containment and the viable Public Transport options to Central Bristol and its urban fringes which are available to existing/future residents, Yate should be a primary focus for future development under the Local Plan.</p>	

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	<p>9. Ensuring the timely and efficient provision of infrastructure to support growing communities:</p> <p>3.32 We support this priority and agree that it is essential that new and growing communities are supported by an appropriate level of infrastructure to maintain and enhance their general sustainability.</p> <p>3.33 The key, as we have touched on above, is ensuring that the scope and need to deliver this infrastructure does not constrain the timely delivery of housing. This can be achieved through the identification of appropriate and deliverable locations. for development. Land to the north/west of Yate is one such location.</p>	
Sue Green - Home Builders Federation	<p>The HBF have no specific comments on the Council's 9 priorities, which are identified as (1) Pursue a carbon neutral & resilient future in a changing climate, (2) Protect & enhance our environment, (3) Development that promotes health & well-being, (4) Creating exceptional places & spaces, (5) Planning for urban & rural areas, (6) Provide the right type & number of new homes, (7) Enable a productive, clean & inclusive economy, (8) Achieving sustainable travel & transport and (9) Ensuring the timely & efficient provision of infrastructure to support growing communities.</p> <p>However, the HBF note that since the formal withdrawal of the West of England (WoE) Joint Spatial Plan (JSP), South Gloucestershire Council has committed to working with Bristol City, BANES & North Somerset Councils and the West of England Combined Authority (WECA) on the preparation of a Spatial Development Strategy (SDS) for the period 2020 – 2040. This work has commenced and the SDS is expected to cover strategic planning priorities including a response to climate change emergency declarations, a spatial vision, a spatial strategy on the broad pattern of housing / employment development & infrastructure, housing & jobs requirements and other thematic policies such as affordable housing. It is important that the priorities and plan period (both start and end dates) of the South Gloucestershire Local Plan and SDS are aligned.</p>	05 Mar 2021
Sue Simmons - Westerleigh Parish Council	<p>There are 9 priorities but it is difficult to know if there should be others as we emerge from the Pandemic.</p>	23 Feb 2021
Swanmoor Stoke Ltd	<p>Please see Section 6 of the accompanying Representation which sets out detailed comments on the nine Priorities. SSL consider them to be aspirational and worthy objectives for the emerging Local Plan. However, it is important that the detail of the Priorities and how they are achieved remain consistent with national policy. The accompanying Representation provides further comment on this.</p> <p>6. The Priorities:</p> <p>6.1 A total of nine potential priorities are set out covering a range of social, economic and environmental issues. They have been identified to help shape the content and approaches to the Local Plan and include:</p> <p>? Pursue a Carbon neutral and resilient future in a changing climate;</p>	06 Apr 2021

Respondent Name	User Response: Text	Response Created
	<p>? Protect and enhance the environment;</p> <p>? Development that promoted health and well-being;</p> <p>? Creating exceptional places and spaces;</p> <p>? Planning for urban and rural areas;</p> <p>? Provide the right number of new homes;</p> <p>? Enable a productive, clean and inclusive economy;</p> <p>? Achieving sustainable travel and transport; and</p> <p>? Ensuring the timely and efficient provision of infrastructure to support growing communities.</p> <p>6.2 SSL support the priorities set out and do not wish to provide detailed comment on what amount to aspirational and worthy objectives. However, it is important that the priorities are consistent with national planning policy.</p> <p>6.3 Priority 2 refers to the objective to ‘protect and enhance our environment.’ This is a high priority. However, as part of this it seeks to avoid directing growth to areas of flood risk. Whilst national policy does place priority on locating development at areas at least flood risk and as set out in Section 3, and in the accompanying Approach to Flood Risk Sequential and Exception Test Assessment (Appendix 2), there is not a bar on locating development in such areas where consideration is given to wider sustainability objectives.</p> <p>6.4 Priority 5 refers to urban and rural growth scenarios around existing settlements and presents this as a determinative approach. The provision for meeting social and economic needs as part of a new community should also be considered as part of this.</p> <p>6.5 Not all priorities will be delivered on an equal footing or achievable in every development scenario. This is recognised in the SA, which measures the effects of the priorities against identified sustainability objectives. For example, the provision of new employment floorspace and providing access to major employment areas are identified as matters which will have a significant positive effect.</p> <p>6.6 In assessing other priorities within the SA, some of the impacts on sustainability objectives have tension with the same priorities. For example, protecting the environment refers to the enhancement of green infrastructure, Biodiversity net gain in development, increasing tree coverage and locating development away from areas of flood risk. However, areas at a greater risk of flooding may have more positive impacts on delivering green infrastructure and Biodiversity net gain. It will therefore be necessary to consider these effects as a package in undertaking site and proposal specific assessment of potential development options moving forward.</p>	
Taylor Wimpey	SECTION 4 – POTENTIAL PRIORITIES:	20 Apr

Respondent Name	User Response: Text	Response Created
UK Ltd - Land at Mangotsfield	<p>Nine potential priorities are identified in this section of the document, broadly speaking we support these aspirations and consider they reflect a suitable range of aspirations for a Local Plan. We have the following comments on this section.</p> <p>Priority 6 seeks to ‘Provide the right type and number of new homes.’ The criteria for this priority includes compliance with the housing need identified in the emerging West of England Spatial Development Strategy (the ‘SDS’). We support this approach as the Local Plan will need to set out the detailed policy and allocations to achieve the growth proposed in the SDS, which is expected to reflect nationally set housing numbers (via the standard methodology) and also account for other relevant local evidence in respect of economic growth, and housing affordability (for example). It is important to ensure the Local Plan is emerging alongside SDS to avoid delays in delivery of this growth once the quantum has been agreed.</p> <p>There is a pressing need to ensure that the genuine OAN for the West of England is met. As explained above, there has been a delay to the new Local Plan caused by the withdrawal of the JSP, this has had real consequences for the ability of the region to effectively plan for the level of growth needed. It is important that any housing requirement figure expressed in this Plan needs to be based on a ‘minimum’ or an ‘at least’ figure. This is needed to ensure that there is sufficient flexibility and resilience in the supply of sites to ensure that the planned level of growth is achieved in the requisite timeframe (i.e. there is not an ongoing ‘under-performance’ in respect of delivery relative to planned growth). This is in line with the requirements of the NPPF, and PPG, the Council need to ensure it plans positively to ensure housing needs are met. This is of particular importance to South Gloucestershire, an Authority that has failed to deliver sufficient housing to meet their adopted housing land supply requirement for some years. We welcome the indication that ‘resilience’ will be added to the five year supply (as stated as part of Priority 6), but this aspiration needs to be translated into an actual policy commitment in the Plan. There is a clear District level issue with regards to the level of housing to be planned for in South Gloucestershire as the Authority is on track to fail to deliver the adopted Core Strategy housing requirement within the Plan period to 2027.</p> <p>Priority 6 also states that land and policies should be provided to facilitate the delivery of small sites, and that provision should be made for self-build and custom housing. Whilst it is not objectionable that some provision be made for homes from these sources, it is important to set realistic and fully evidenced policy aspirations for these type of sites. The latest full AMR (2019) published by the Council shows that 83% of actual completions in the last year was on sites of over 10 units, i.e. major development sites. There needs to be recognition that major development sites will continue to play the key role in delivery of the housing requirement in the new Plan. Sufficient major sites need to be allocated, and policy should be worded in a way that facilitates the development rather than become too prescriptive, particularly in light of the failure of the Core Strategy to realise completions on allocated sites as expected. If it is a specific policy aspiration to ensure development on small sites can be facilitated, the Council should also consider</p>	2021

Respondent Name	User Response: Text	Response Created
	<p>policy provision to avoid delays to delivery and ensure actual housing is realised on the major development sites that will ultimately make up the majority of the Council's supply.</p>	
Taylor Wimpey UK Ltd - Land at Vilner Farm	<p>Priority 6 seeks to 'Provide the right type and number of new homes.' The criteria for this priority includes compliance with the housing need identified in the emerging West of England Spatial Development Strategy (the 'SDS'). We support this approach as the Local Plan will need to set out the detailed policy and allocations to achieve the growth proposed in the SDS, which is expected to reflect nationally set housing numbers (via the standard methodology) and also account for other relevant local evidence in respect of economic growth, and housing affordability (for example). It is important to ensure the Local Plan is emerging alongside SDS to avoid delays in delivery of this growth once the quantum has been agreed.</p> <p>There is a pressing need to ensure that the genuine OAN for the West of England is met. As explained above, there has been a delay to the new Local Plan caused by the withdrawal of the JSP, this has had real consequences for the ability of the region to effectively plan for the level of growth needed. It is important that any housing requirement figure expressed in this Plan needs to be based on a 'minimum' or an 'at least' figure. This is needed to ensure that there is sufficient flexibility and resilience in the supply of sites to ensure that the planned level of growth is achieved in the requisite timeframe (i.e. there is not an ongoing 'under-performance' in respect of delivery relative to planned growth). This is in line with the requirements of the NPPF, and PPG, the Council need to ensure it plans positively to ensure housing needs are met. This is of particular importance to South Gloucestershire, an Authority that has failed to deliver sufficient housing to meet their adopted housing land supply requirement for some years. We welcome the indication that 'resilience' will be added to the five year supply (as stated as part of Priority 6), but this aspiration needs to be translated into an actual policy commitment in the Plan. There is a clear District level issue with regards to the level of housing to be planned for in South Gloucestershire as the Authority is on track to fail to deliver the adopted Core Strategy housing requirement within the Plan period to 2027.</p> <p>Priority 6 also states that land and policies should be provided to facilitate the delivery of small sites, and that provision should be made for self-build and custom housing. Whilst it is not objectionable that some provision be made for homes from these sources, it is important to set realistic and fully evidenced policy aspirations for these type of sites. The latest full AMR (2019) published by the Council shows that 83% of actual completions in the last year was on sites of over 10 units, i.e. major development sites. There needs to be recognition that major development sites will continue to play the key role in delivery of the housing requirement in the new Plan. Sufficient major sites need to be allocated, and policy should be worded in a way that facilitates the development rather than become too prescriptive, particularly in light of the failure of the Core Strategy to realise completions on allocated sites as expected. If it is a specific policy aspiration to ensure development on small sites can be facilitated, the Council should also consider policy provision to avoid delays to delivery and ensure actual housing is realised on the major development sites that will ultimately make up the majority of the</p>	20 Apr 2021

Respondent Name	User Response: Text	Response Created
	Council's supply.	
Terry Chamberlain and Alan Jobbins	<p>3.2 Climate Change is rightly identified as a key issue that the Local Plan should seek to address and we are supportive of the Council's ambitions to achieve Carbon neutrality by 2030.</p> <p>3.3 With regard to Housing Delivery, we agree that it is important for new development to support the de-carbonisation of transport to minimise usage of the private motor vehicle and maximise opportunities for walking and cycling. It will be imperative to locate development where access to existing or new services, facilities, employment opportunities and Public Transport are/will be strong.</p> <p>3.4 Furthermore, the advent of electric vehicles and increased levels of home-working are not reasons that would justify a departure from this approach. This is because there are significant economic and social benefits to ensuring that people can access the above through a variety of means.</p> <p>3.5 However, one also needs to be realistic in acknowledging individual travel patterns and behaviours will still mean additional vehicular journeys will be required. This can be mitigated by ensuring that where vehicular journeys will be made, the relative distance required to access services, facilities and employment opportunities are minimised. This would, naturally, support development at existing key settlements (e.g. Frampton Cotterell and Coalpit Heath) and areas with good access to the Bristol Urban Fringe (e.g. Hambrook, Olveston etc).</p> <p>3.6 That said, maximising the potential for sustainable patterns of development will only go so far. A significant contributor to emissions is energy consumption within individual dwellings and, as a result, we also support a requirement for higher energy efficiency standards to minimise energy demand. We note that the Government has now withdrawn its intention to restrict Councils' ability to set higher energy performance standards than those prescribed in the Building Regulations. As such, we would support an approach which sought to achieve a higher standard than would otherwise be imposed at a national level.</p> <p>3.7 Furthermore, the Government are still pursuing their Future Homes Standard which will require all new homes to be highly efficient with low Carbon heating and zero Carbon ready by 2025. Requiring all new homes to be Carbon neutral upon the Plan's adoption would not be such a significant step up from what will, ultimately, be the status quo moving forward and so we would support this approach.</p> <p>2. Protect and enhance our environment.</p> <p>3.8 The Environment is the next identified theme and, again, we are entirely supportive of the need to ensure that development leads to a betterment of the District's Biodiversity and Green Infrastructure assets and should seek to exceed identified standards where possible.</p> <p>3. Development that promotes health and well-being.</p>	05 May 2021

Respondent Name	User Response: Text	Response Created
	<p>3.9 Again, we are generally supportive of this priority and are committed to ensuring that high-quality open space and access to active/Public Transport routes/connections are provided.</p> <p>4. Creating exceptional places and spaces.</p> <p>3.10 All development should aspire to secure the highest standards of urban design and so we fully support the need for areas of growth to be legible, walkable and beautiful places to work, live and play.</p> <p>5. Planning for urban and rural areas.</p> <p>3.11 Naturally, we support any attempts to maximise the development potential within existing urban and rural settlements. However, we also welcome the acknowledgement that this will only go so far in meeting overall housing needs and that greenfield sites will be needed to meet the development needs of the District and other WECA members. We would note that this conclusion is also reached by the Sustainability Appraisal (SA).</p> <p>3.12 For reasons set out later in this document, we consider exceptional circumstances will exist to justify the removal of land from the Green Belt to support the Council's development needs. Where this is necessary, we wholeheartedly support the need to ensure that new boundaries are robust and defensible to improve its important function of restricting further urban sprawl.</p> <p>3.13 We would note that the SA indicates that there will likely be significant sustainability benefits associated with the release of Green Belt land for both strategic and non-strategic levels of development and that this should be explored through the Local Plan process.</p> <p>6. Provide the right type and number of new homes.</p> <p>3.14 We await the progression of the West of England SDS for further details on the housing requirement that will ultimately be adopted. The only thing we would note is that the Standard Method yields a slightly higher minimum annual requirement than the adopted Core Strategy (1,360 vs 1,412 dwellings per annum).</p> <p>3.15 We are also mindful that there has been a significant increase to Bristol's need following the revisions to the Standard Method (which has added around 830 dwellings to their annual requirement). Given the limited availability of land around within Bristol's administrative boundary, it is unlikely that it will be able to meet its previously predicted need, let alone this increased minimum requirement itself.</p> <p>3.16 Furthermore, constraints around Bath will likely limit the scope for it to accommodate some of Bristol's unmet need and so the onus will be on South Gloucestershire (and potentially North Somerset) to assist in meeting Bristol's unmet needs. As such, we would expect South Gloucestershire's minimum housing requirement be uplifted significantly from the standard method figure to account for</p>	

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	<p>this.</p> <p>3.17 It will be important for progress to be made on the SDS and a joint position to be reached with North Somerset in order to understand how housing will need to be distributed across the region and allow for effective and viable options to be considered.</p> <p>3.18 It is also imperative that a significant proportion of this development is well related to the Bristol Urban Area given that it will be looking to meet the needs of residents who need to be functionally well related to it. This would support the delivery of development on important transport routes (MetroBus routes) which are well related to the Bristol Urban Fringes. Hambrook already benefits from a handful of regular and semi-regular bus services (Y3, Y4 and the 626) and also lies in close proximity to the Bristol Ring Road which serves the M3 MetroBus service and a handful of others (Y1, 18, 19 and 462).</p> <p>3.19 Bristol Parkway also lies about 1.5 miles from Hambrook which would equate to a 30 minute walk. Major employment areas, including the Bristol Business Park, UWE and the MOD, as well as retail/leisure uses at the Abbey Wood Business Park are also within a 30 – 40 minute walk from Hambrook which, whilst not especially convenient, is still possible. Furthermore, the wider area benefits from excellent cycle connectivity which means these aforementioned services are within a 10 – 15 minute cycle of Hambrook village.</p> <p>3.20 We welcome the acknowledgement of the difficulties the Council has had with delivery in recent years and we would stress that the deliverability of any strategy should be a central guiding principle for the Plan. Large strategic sites will be essential to securing the overall housing requirement; however, they tend to have long lead in times, can have various complexities and often need to secure enabling infrastructure in advance of their delivery.</p> <p>3.21 The Council has had first-hand experience of this in recent years with delays to the Cribbs Patchway and East of Harry Stoke New Neighbourhoods being a key reason for their deficient housing land supply position. This has facilitated significant levels of speculative development at sites beyond the Green Belt and placed significant pressure on rural communities to make up the shortfall. Such development is not necessarily unsustainable, but it sits outside of the adopted Plan's overarching development framework which would otherwise secure a more socially, environmentally and economically sustainable outcome.</p> <p>3.22 Consequently, it is imperative that the Council identify strategic development locations with deliverability at the forefront of any considerations. Development locations that would require significant upfront enabling infrastructure should be carefully considered against alternative locations with less onerous requirements.</p> <p>3.23 Another important factor to consider is the relatively compressed timescale for the Local Plan and how this will affect the delivery of housing. The new Local Plan will cover a period of 15 years which is five years less than the JSP; however, the housing requirement has remained around the same level (c. 80,000 dwellings) for</p>	

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	<p>the WECA Authorities[1]. In simple terms, the WoE Authorities are going to have to plan for a similar amount of housing to the JSP in a shorter period of time.</p> <p>3.24 This compressed timescale also means that anticipated delivery from large strategic sites over the Plan period will be reduced, especially when one factors in lead in times and applies realistic trajectories to the delivery of housing[2]. The Phase 1 document has raised the importance of ensuring that the final strategy is deliverable and any slips to delivery on identified strategic sites could have serious consequences for the Council in demonstrating a deliverable supply of housing over the longer-term.</p> <p>3.25 The potential result is that a greater number of SDLs will need to be identified compared with the JSP to mitigate this risk, with the majority of these delivering housing beyond the end of the Plan period. The Local Plan will, therefore, need to take a longer-term view at this stage in the interests of ensuring the medium-term development needs of the District are met.</p> <p>3.26 We would, therefore, strongly urge the Council to review alternative locations for growth and prioritise those which would require significantly less onerous infrastructure to facilitate their delivery and more realistically and reliably deliver the housing the Council needs over the Plan period.</p> <p>3.27 This strategy should also be supplemented by an appropriate level of growth at the rural villages. Development at these villages is often required to ensure their vitality and viability is maintained and to ensure that important services (shops, GP Surgeries, Schools etc) are maintained. The Green Belt constraint at a number of rural villages has limited the scope for development to come forward in recent Decades and this has placed a disproportionate amount of pressure on non-Green Belt settlements (e.g. Falfield and Wickwar).</p> <p>[1] Albeit the distribution is more heavily weighted toward Bristol.</p> <p>[2] The often cited 'From Start to Finish' report by Lichfields should inform these assumptions.</p> <p>3.28 Furthermore, the majority of the Green Belt villages are located in close proximity to important settlements or the Bristol Urban fringe. This makes them generally more sustainable locations for growth than their non-Green Belt counterparts. As we have touched on above, Hambrook is one such settlement which is particularly sustainable and this is reflected in the Council's Rural Settlements Topic Paper.</p> <p>3.29 Appropriate levels of growth at both Green Belt and non-Green Belt villages can help to underpin housing delivery, particularly in the early periods of the Plan period as larger strategic sites navigate their way through the planning process.</p> <p>7. Enable a productive, clean and inclusive economy.</p> <p>3.30 We are generally supportive of this priority and are especially supportive of</p>	

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	<p>the need to enhance digital connectivity across the area in light of shifting working patterns as a result of the pandemic.</p> <p>8. Achieving sustainable travel and transport.</p> <p>3.31 Page 47 of the Consultation Document provides a useful summary of travel to work patterns and the level of self-containment (in this context defined by the percentage of people who live and work in the same area) of certain parts of the District. What this illustrates is that not only does the North Fringe of Bristol benefit from high levels of self-containment, but also that it acts as a magnet for the wider South Gloucestershire area with significant levels of in-commuting from Avonmouth, Thornbury, Yate and the Eastern Fringe.</p> <p>3.32 Locating development in close proximity/with good transport access to the Northern Fringe will be important in securing sustainable patterns of travel across the District.</p> <p>9. Ensuring the timely and efficient provision of infrastructure to support growing communities.</p> <p>3.33 We support this priority and agree that it is essential that new and growing communities are supported by an appropriate level of infrastructure to maintain and enhance their general sustainability.</p> <p>3.34 The key, as we have touched on above, is ensuring that the scope and need to deliver this infrastructure does not constrain the timely delivery of housing. This can be achieved through the identification of appropriate and deliverable SDLs, which are underpinned by an appropriate level of non-strategic growth at the rural villages.</p>	
The Badminton Estate	<p>Please see accompanying representation.</p> <p>In response to this, the ‘Potential Priorities’ outlined by the Council are considered by the Estate to be appropriate and measured and are generally supported.</p> <p>3.10 Specifically, Priority 5) ‘Planning for urban and rural areas’ is considered key in order to help plan growth positively and sustainably within the District. Bullet point 3 under that priority seeks to “share the benefits of well-planned growth and prosperity across urban and appropriate rural communities.” To achieve that it is considered Priority 6) ‘Provide the right type and number of new homes’ will have a role to play which supports the provision of a variant in site sizes and location to help meet the District’s housing need. Equally, Priority 7) ‘Enable a productive, clean and inclusive economy’ recognises the importance of a “green economic recovery” resulting from COVID-19 and seeks to “ensure a balanced range of safeguarded employment land across South Gloucestershire” is achieved, enabling all communities to have access to job opportunities via sustainable modes of transport. This is also reflected in Priorities 1) ‘Pursue a Carbon neutral and resilient future in a changing climate’ and 4) ‘Creating exceptional places and spaces.’</p>	04 May 2021

Respondent Name	User Response: Text	Response Created
	<p>3.11 We consider the Council have recognised suitable priorities in which to achieve sustainable development across the District, and as part of this have considered how rural communities can benefit from such development.</p>	
<p>Theodore Butt Philip - South Gloucestershire Liberal Democrat Council Group</p>	<p>We think the following considerations need to be taken into account:</p> <p>Climate Change</p> <p>We welcome the inclusion of the Climate Emergency as the first priority listed. South Gloucestershire Council declared a Climate Emergency on 17th July 2019 and it is vital that an acknowledgement that this is an emergency, requiring an emergency-level response from all parts of the Council, runs through all Council policies, especially the Local Plan which has the potential to do significant good for our communities, whilst also risking doing significant harm if the right decisions are not made.</p> <p>Other themes we thinks need to be considered:</p> <p>Giving residents control of the future of their district</p> <p>We recognise the need for development to take place, but we regret incidents where development has been allowed to take place inside South Gloucestershire outside the policies of the local plan and without the support of the local community. It is necessary that South Gloucestershire’s new local plan has the flexibility to adapt to changing circumstances – long-term adaption to meet the demands of the Climate Emergency and short-terms changes to meet the demands of the Covid-19 pandemic have demonstrated how land use priorities can change. But we must create a Local Plan for South Gloucestershire which has the support of our local residents which gives them confidence about where and when development will take place.</p> <p>Strong Communities</p> <p>The purpose of the Local Plan is to set the agenda for the development of the district over a 15-year period. We do not believe that what is currently being consulted on is ambitious enough in terms of building strong communities.</p> <p>South Gloucestershire is made up of a wide variety of types of community, all of them special and with their own identities. These identities need to be respected and their communities need to be strengthened.</p> <p>In almost every community there is concern about the loss of amenities. Small rural villages are worried about maintaining facilities such as pubs, shops and schools. Larger communities worry that those facilities which make them attractive such as schools, shops and transport links will be overwhelmed by excessive development, without the necessary additional infrastructure. Towns, suburbs and urban areas worry about threats to the High Street and the need to adapt to a changing reality. In communities of all types, we are concerned about ensuring the provision of facilities such as village and community halls, theatres and pubs, which allow communities to come together.</p>	<p>12 Mar 2021</p>

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	<p>A Connected District</p> <p>Ensuring that all parts of the district are well connected with the infrastructure which is important for 21st century life will need to be a vital part of this plan. This includes being connected to a low-zero carbon transport network e.g. access to safe cycling/walking routes (which are part of a district-wide network) and the availability of appropriate public transport, as well as superfast broadband and mobile connectivity.</p> <p>Equality</p> <p>We need to create a district with equality at its heart. This will be a cross-cutting theme which impacts on both a macro and micro level. We need to build homes which are accessible and can be adapted as people's needs change throughout their lives. We must also ensure that everyone has access to a decent home, of sufficient size to meet their needs, these homes must be at prices which can be afforded (be they rented or owned).</p> <p>Prosperity</p> <p>Ensuring South Gloucestershire has a thriving economy, which all our citizens can access the benefits of. This means:</p> <p>Sufficient employment land of the right kind, in the right places. Ensuring employment land, when and where needed (especially high-value employment land) is not given over to housing or low-value employment.</p> <p>Wellbeing</p> <p>The decisions made in the Local Plan process will have a major long-term impact on the lives of people who live, work and study in South Gloucestershire over the coming decades. We must ensure that protecting people's wellbeing, as well as pure economic prosperity is taken into account.</p> <p>Flexibility</p> <p>The Local Plan must recognise that the needs of the district will adapt over time. The current Covid-19 pandemic has demonstrated how quickly land-use needs can change. How we use our homes and what we require of them is changing, likewise the way we shop, work and travel is changing. We must take account of this and the possibility of future changes.</p>	
The Tortworth Estate	<p>All of these priorities are necessary to deliver high quality and sustainable development and they give a high-level idea of how the issues in the previous section would be addressed.</p> <p>If there was to be one "key priority" that presides over all the others we suggest it would be 'Pursue a Carbon neutral and resilient future in a changing climate' as this sits across all of the other potential priorities in one way or another. For</p>	05 Mar 2021

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	<p>example:</p> <ul style="list-style-type: none"> - Priority 2: Enhancing Biodiversity and increasing tree planting has climatic benefits. - Priority 3: enabling healthy/active lifestyles may help reduce car travel, reducing Carbon emissions. - Priority 4: Designing new development to meet stringent environmental/ sustainability requirements will reduce Carbon emissions, while walkable neighbourhoods will reduce the need to travel. - Priorities 5 and 6 – locating the right development in the right places, supported by appropriate infrastructure should reduce reliance on the private car for journeys. - Priority 6 – Seeking to achieving “green” economic growth is all about reducing Carbon emissions and embracing sustainable growth and development. 	
Tim Jay	<p>Your analysis has no mention powered two-wheeled vehicles. This is not good enough!</p> <p>Provide secure parking & promote awareness with roadside poster campaign. Your report often states the commuting/shopping distances are too far or difficult to walk. Cycling is suitable for some people travelling a few miles. Not everyone is able to cycle. The ring road is very congested with cars. People are reluctant to use public transport with the virus. Even car sharing is effected if not the same household. The cycle path has a poor crime record in east Bristol. Motorcycles are a quick win to reduce emissions & congestion.</p> <p>The only negative that people apply to motocyling is safety, yet it is a self solving problem. If motorcycles were promoted more and incentives given, such as the ride to work schemes for bicycles. Then simply having a large percentage of traffic as motorbikes would get car drivers used to seeing them. In countries where motorcycles are widely used drivers have a better awareness and expectancy of seeing them.</p> <p>Electric motorcycles are becoming more available, and I find this a very exciting prospect. But while sales are low they will remain unattainable for many. Prop up schemes and help to buy, could push forward their acceptance.</p> <p>One major flaw is the current stopping of CBT and motorcycle training in general. CBTs expire, yet there has been no extension of CBTs for those that have had them expire during lockdown - whilst this might not be the place to discuss this, the point still needs to be raised.</p>	04 Feb 2021
Tom Cotton - Road Haulage Association	<p>Heavy Goods Vehicles require appropriate places to park and for their drivers to take mandatory breaks and rest periods. It is essential that there are proper places and facilities for drivers to do this. Lay-by's and purpose built Lorry Parks must be provided to avoid conflict in residential areas.</p> <p>Regardless of the traction power source Heavy Goods Vehicles will be required for</p>	01 Mar 2021

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	the next 15 years. All food, medicine and other essential goods are delivered by road at some stage of their journey.	
Top To Bottom Ltd and Hanham Community Trust	<p>See attached representations.</p> <p>At this stage in the Local Plan process the broad priorities outlined identify the key areas where there is a requirement to focus policy and strategy implementation. Identifying such priorities is useful to ensure that future policies and strategies developed around these when formulating more detailed areas of the Local Plan document.</p> <p>Priority 6 should be clear that the objective is to embrace growth and significantly boost housing supply, in accordance with NPPF paragraph 59. The objective of meeting identified needs should be expressed as a minimum and recognising the potential across the District to meet regional needs where necessary should also be identified as a priority. Furthermore, it should be a priority that the Local Plan ensures this housing supply is boosted and can begin delivering immediately, allocating available and achievable land whilst learning from the experience of the current Core Strategy, as discussed above and outlined in Issue no. 32.</p> <p>It is acknowledged that priority 6 identifies the requirement to ‘provide a portfolio of sites, of different sizes, in a range of sustainable locations across South Gloucestershire’ (Page 57). It is supported that the Spatial Strategy is underpinned by focusing development at ‘accessible’ locations that are well related to existing urban areas, served by existing sustainable transport routes, or with the ‘potential’ to be sustainable as a result of the ‘type and form’ of development proposed. This should be achieved through a detailed review of the Green Belt and an assessment of the most sustainable rural settlements, which hold a number of the characteristics required to achieve sustainable development.</p> <p>Such a review would lead to achieving more sustainable patterns of development across the District in accordance with the South Gloucestershire Council’s Climate Emergency declaration.</p>	11 May 2021
Tristan Clark - South Gloucestershire Council	<p>Priority 6 – the LPA must, rather than relying on laissez-faire market principles, take a proactive role when it comes to determining the range of housing provided in medium to large housing developments. The natural tendency of housing developers is to favour three to five bed properties regardless of respective level of local need. The local authority must, for each area of South Gloucestershire, regularly assess the need for a full range of housing types and this should feed into active planning policies. The age profiles of numerous settlements in South Gloucestershire are becoming problematically distorted due to there being an insufficient range of properties to accommodate residents in different stages of their lives.</p> <p>Priority 8 – Officers must be far more realistic when assessing walkable and cyclable distances. Parents with one or more young children are highly unlikely to walk or cycle long distances to access schools (especially in winter). The fact that, due to inclement weather, there is going to be significant seasonal variance in the number of residents walking and cycling is predominantly ignored by officers.</p>	01 Mar 2021

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	<p>Residents who are prepared to cycle or walk will only endure bad weather for a limited distance before reverting to the convenience of using motor vehicles. Planning officers are wildly inconsistent when it comes to assessing the safety of walking or cycling routes to nearby services. The high level of car dependency within South Gloucestershire will not decline so long as the local authority holds woefully unrealistic expectations about sustainable forms of transportation.</p>	
<p>Trystan Mabbitt - Hanson UK - Heidelberg Cement Group</p>	<p>Fundamental priorities must be to provide the requisite levels of housing, jobs and ancillary infrastructure. How housing and employment opportunities are created and to what aesthetic, environmental and cultural standards are important, but these considerations are subsidiary to the fundamental priorities of providing people with sufficient places to live and work.</p> <p>The first bullet point under the priority ‘Provide the right type and number of new homes’ and the 4th bullet point under the priority ‘Enable a productive, clean and inclusive economy’ should therefore be separated out as explicit ‘Fundamental Priorities.’</p> <p>Crucially, achieving these fundamental priorities is dependent upon the ready supply of construction materials, including primary and secondary mineral resources.</p> <p>As highlighted in the Council’s ‘South Gloucestershire Local Plan Policies, Sites and Places Plan Background Evidence: Minerals, May 2015, “Aggregates are the most commonly used minerals in the UK and are essential to a modern economy. They provide the critical raw material for built development and other construction, manufacturing and the maintenance of infrastructure, through their use as concrete, mortar, finishes, roadstone, constructional fill and railway ballast.” The majority of aggregate demand is met from primary sources, which involves extracting material directly from the ground and dredging from the sea floor. Ensuring an ample supply of construction materials must therefore also be a fundamental priority.</p> <p>Whilst this is implicit in the ‘Ensuring the timely and efficient provision of infrastructure to support growing communities’ potential priority, ensuring an ample supply of construction materials and minerals should be explicit and included as sub-text to the separated out fundamental priorities above.</p>	<p>18 Mar 2021</p>
<p>Victoria Bailey - Oldbury on Severn Parish Council</p>	<p>In broad terms at this stage the priorities seem acceptable.</p>	<p>24 Mar 2021</p>
<p>Vistry Group</p>	<p>Please refer to enclosed representations.</p> <p>Section 4: Potential Priorities:</p> <p>Do you agree with the potential priorities?</p> <p>Do you have any comments on the potential priorities?</p> <p>The potential priorities identify more concisely the key issues influencing Plan-</p>	<p>06 May 2021</p>

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	<p>making. However, the Spatial Strategy for the District must be based on that which is defined by the emerging WECA SDS. For the reasons set out above (Section 1) it is crucial that the SGLP strategic priorities align with the SDS to address the key cross boundary themes and issues identified. Any deviation from SDS would undermine the combined objectives of the WECA Authorities and strategic function of the SDS.</p> <p>The Consultation Document implies that the potential priorities will inform the choices and options for making decisions on the location of new homes, jobs, facilities, and services. However, as set out above, the SDS will identify the broad locations for strategic growth within the sub-region, and it is to this strategy that the Local Plan should adhere, principally. The SDS for the WECA area will be illustrated on the key diagram[3] and the Local Plans will need to follow this lead.</p> <p>[3] A requirement under Schedule 5(1) of The Combined Authorities (Spatial Development Strategy) Regulations 2018 (as amended).</p> <p>It is understood that the current intention is for site allocations to be made within the constituent Local Plans, rather than by the SDS. However, this approach may limit the potential for effective strategic planning to take place across the region in circumstances where future sustainable growth locations cross district boundaries. As a consequence of amendments to the 2018 Regulations the SDS is able to include Inset Diagrams that allocate sites for development, and in the course of preparing the strategy it may be determined that this role should be taken on by the SDS in the interests of promoting truly sustainable forms of development in the WECA area. The Local Plan should avoid at this early stage pre-determining decisions relating to the location of homes, jobs etc that should be guided by the Spatial Strategy for the sub-region, in accordance with the strategic priorities set by the SDS. The role of the potential priorities listed in the Consultation Document should, therefore, be clarified in the context of the SDS. It is important that this is undertaken clearly at an early stage to establish the foundation for preparation of the SGLP, including the accompanying Sustainability Appraisal. The experience of the JSP process made clear to all parties involved that a bottom-up definition of a Spatial Strategy dictated by political agendas operating within individual areas will not succeed and will be unable to withstand scrutiny through examination. The Plan-making Authorities within WECA must be careful to avoid repeating these mistakes.</p> <p>A critical and overarching priority for the sub-region (and the District) is to ensure there is a sufficient supply of homes to support an expanding and changing population, and to support economic recovery. While the Housing Requirement for the District is a matter that is rightly being addressed by the SDS, Plan preparation and policy formulation at all levels must be built upon a clear understanding that housing supply within the sub-region is falling significantly short of demonstrable need. As identified by the Consultation Document, addressing the affordability of housing is a significant challenge that the development plan must address; there is an acute need for affordable housing within all of the WECA Authority areas - house price and rental cost inflation have outstripped increases in incomes, hindering access to the housing market. Many people in the District and sub-region</p>	

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	<p>are unable to rent or buy homes on the open market and there is an insufficient supply of affordable housing to meet demand. People are, therefore, being deprived of the right to live comfortably in accommodation that is appropriate to meet their needs.</p> <p>Under the Government’s revised standard methodology calculation (December 2020) the housing need figure for the combined WECA area has increased dramatically: Bristol City is now subject to a 35% cities and urban centres uplift, which increases the LHN figure from 2,368 dwellings per annum (dpa) to 3,196dpa, and raises the WECA area figure from 4,428 dpa to 5,256dpa. If North Somerset is added in as a Duty to Co-Operate partner, the annual figure increases to 6,621dpa. The PPG is also clear that the standard method for calculating local housing need identifies a minimum annual housing need figure. It does not produce a housing requirement. Councils can (and should) exceed the minimum figures to deliver a marked improvement in the availability and variety of new homes at a price that is affordable to those who live and work in the area.</p> <p>The JSP process estimated that Bristol City would be capable of accommodating only around 1,700 dpa, meaning that against current assessments of LHN a residual figure of circa 1,500 dpa will need to be accommodated within the adjoining Local Authority areas. While Bristol’s capacity will be reassessed via the SDS there is no basis on which to anticipate that the residual figure will be substantially less. South Gloucestershire will, therefore, have an important role to play in accommodating the unmet needs of Bristol.</p> <p>For this reason, it is more important than ever that the WECA Authorities (and Duty to Co-Operate partners) are aligned in identifying combined priorities for the sub-region and produce a comprehensive joint strategy that underpins strategic policies, including the amount, distribution and location of development.</p> <p>With regard to Climate Change, Vistry recognises the challenge that faces existing and future generations and understands the imperative to deliver solutions that safeguard the environment. It is noted that the Council and WECA have set an ambitious target to be ‘Carbon neutral’ by 2030, while the UK as a whole is on the path to net zero by 2050[4]. The sub-regional target requires a step change in the way that people live and work – it is about changing both existing and future habits, which will require a holistic strategy at the sub-regional level to succeed. As reflected in Section 2 of the Consultation Document, the development plan (the SDS and the Local Plan) must grapple with numerous (sometimes conflicting) issues and priorities that need to be balanced in order to achieve a sustainable outcome. The challenge is to ensure that agendas are aligned in a positive and realistic way through the formulation of policies that reflect the overarching vision for the sub-region and the District, and which can deliver sustainable growth in a manner that is viable, effective and responsive to needs.</p> <p>[4] UK’s Nationally Determined Contribution, 12 December 2020.</p> <p>Vistry’s comments on the Council’s draft emerging policies are set out in response to the relevant questions below.</p>	

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Vistry Group - Land at Post Farm	<p data-bbox="338 286 858 322">SECTION 4 – POTENTIAL PRIORITIES:</p> <p data-bbox="338 358 1315 461">Nine potential priorities are identified in this section of the document and broadly speaking we support these aspirations and consider they reflect a suitable range of aspirations for a Local Plan, with the following comments on this section.</p> <p data-bbox="338 497 1337 846">Priority 6 seeks to ‘Provide the right type and number of new homes.’ The criteria for this priority includes compliance with the housing need identified in the emerging West of England Spatial Development Strategy (the ‘SDS’). We support this approach as the Local Plan will need to set out the detailed policy and allocations to achieve the growth proposed in the SDS, which is expected to reflect nationally set housing numbers (via the standard methodology) and also account for other relevant local evidence in respect of economic growth, and housing affordability (for example). It is important to ensure the Local Plan is emerging alongside SDS to avoid delays in delivery of this growth once the quantum has been agreed.</p> <p data-bbox="338 882 1337 1688">There is a pressing need to ensure that the genuine OAN for the West of England is met. As explained above, there has been a delay to the new Local Plan caused by the withdrawal of the JCS, this has had real consequences for the ability of the region to effectively plan for the level of growth needed. It is important that any housing requirement figure expressed in this Plan needs to be based on a ‘minimum’ or an ‘at least’ figure. This is needed to ensure that there is sufficient flexibility and resilience in the supply of sites to ensure that the planned level of growth is achieved in the requisite timeframe (i.e. there is not an ongoing ‘under-performance’ in respect of delivery relative to planned growth). This is in line with the requirements of the NPPF, and PPG, and the Council needs to ensure it plans positively to ensure housing needs are met. This is of particular importance to South Gloucestershire, an Authority that has historically failed to deliver sufficient housing to meet targets set within adopted Plans, and where there have been periods during which no deliverable five year housing land supply has been available; notwithstanding recent increases in housing delivery and compliance with the Housing Delivery Tests measurement, failing to deliver planned levels of housing growth should be mitigated within future Plans. We welcome the indication that ‘resilience’ will be added to the five year supply (as stated as part of Priority 6), but this aspiration needs to be translated into an actual policy commitment in the Plan. There is a clear District level issue with regards to the level of housing to be planned for in South Gloucestershire as the Authority is set to fail to deliver the adopted Core Strategy housing requirement within the Plan period to 2027.</p> <p data-bbox="338 1724 1337 2000">Priority 6 also suggests that the Plan should “Provide land and policies to facilitate the delivery of small sites,” and that provision should be made for self-build and custom housing. Whilst it is not objectionable that some provision be made for homes from these sources, it is important to set realistic and fully evidenced policy aspirations for these types of sites. The latest full AMR (2019) published by the Council shows that 83% of actual completions in the last year was on sites of over 10 units, i.e. major development sites. There needs to be recognition that major development sites will continue to play the key role in delivery of the housing</p>	29 Apr 2021

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	<p>requirement in the new Plan. Sufficient major sites need to be allocated, and policy should be worded in a way that facilitates the development rather than being too prescriptive, particularly in light of the failure of the Core Strategy to realise completions on allocated sites as expected. If it is a specific policy aspiration to ensure development on small sites can be facilitated, the Council should also consider policy provision to avoid delays to delivery and ensure actual housing is realised on the major development sites that will ultimately make up the majority of the Council's supply. It is also relevant for the Plan to consider that any strategy which relies on more smaller development sites, would result in fewer opportunities to deliver necessary community and other infrastructure as part of these developments, and require greater involvement from the Local Authority to ensure this delivery (funded via CIL or other mechanisms) which supports growth (this directly links to Priority 9 which relates to the "timely and efficient provision of infrastructure to support growing communities").</p>	
<p>Vistry Group - Land at Yew Tree Farm</p>	<p>SECTION 4 – POTENTIAL PRIORITIES:</p> <p>Nine potential priorities are identified in this section of the document and broadly speaking we support these aspirations and consider they reflect a suitable range of aspirations for a Local Plan, with the following comments on this section.</p> <p>Priority 6 seeks to 'Provide the right type and number of new homes.' The criteria for this priority includes compliance with the housing need identified in the emerging West of England Spatial Development Strategy (the 'SDS'). We support this approach as the Local Plan will need to set out the detailed policy and allocations to achieve the growth proposed in the SDS, which is expected to reflect nationally set housing numbers (via the standard methodology) and also account for other relevant local evidence in respect of economic growth, and housing affordability (for example). It is important to ensure the Local Plan is emerging alongside SDS to avoid delays in delivery of this growth once the quantum has been agreed.</p> <p>There is a pressing need to ensure that the genuine OAN for the West of England is met. As explained above, there has been a delay to the new Local Plan caused by the withdrawal of the JCS, this has had real consequences for the ability of the region to effectively plan for the level of growth needed. It is important that any housing requirement figure expressed in this Plan needs to be based on a 'minimum' or an 'at least' figure. This is needed to ensure that there is sufficient flexibility and resilience in the supply of sites to ensure that the planned level of growth is achieved in the requisite timeframe (i.e. there is not an ongoing 'under-performance' in respect of delivery relative to planned growth). This is in line with the requirements of the NPPF, and PPG, and the Council needs to ensure it plans positively to ensure housing needs are met. This is of particular importance to South Gloucestershire, an Authority that has historically failed to deliver sufficient housing to meet targets set within adopted Plans, and where there have been periods during which no deliverable five year housing land supply has been available; notwithstanding recent increases in housing delivery and compliance with the Housing Delivery Tests measurement, failing to deliver planned levels of housing growth should be mitigated within future Plans. We welcome the indication that 'resilience' will be added to the five year supply (as stated as part of</p>	<p>29 Apr 2021</p>

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	<p>Priority 6), but this aspiration needs to be translated into an actual policy commitment in the Plan. There is a clear District level issue with regards to the level of housing to be planned for in South Gloucestershire as the Authority is set to fail to deliver the adopted Core Strategy housing requirement within the Plan period to 2027.</p> <p>Priority 6 also suggests that the Plan should “Provide land and policies to facilitate the delivery of small sites,” and that provision should be made for self-build and custom housing. Whilst it is not objectionable that some provision be made for homes from these sources, it is important to set realistic and fully evidenced policy aspirations for these types of sites. The latest full AMR (2019) published by the Council shows that 83% of actual completions in the last year was on sites of over 10 units, i.e. major development sites. There needs to be recognition that major development sites will continue to play the key role in delivery of the housing requirement in the new Plan. Sufficient major sites need to be allocated, and policy should be worded in a way that facilitates the development rather than being too prescriptive, particularly in light of the failure of the Core Strategy to realise completions on allocated sites as expected. If it is a specific policy aspiration to ensure development on small sites can be facilitated, the Council should also consider policy provision to avoid delays to delivery and ensure actual housing is realised on the major development sites that will ultimately make up the majority of the Council’s supply. It is also relevant for the Plan to consider that any strategy which relies on more smaller development sites, would result in fewer opportunities to deliver necessary community and other infrastructure as part of these developments, and require greater involvement from the Local Authority to ensure this delivery (funded via CIL or other mechanisms) which supports growth (this directly links to Priority 9 which relates to the “timely and efficient provision of infrastructure to support growing communities”).</p>	
Waddeton Park Ltd	<p>There is no doubt that priority should be afforded to the reuse of previously developed land. However, such an approach will only provide a small amount of the land needed and, therefore, some greenfield land in appropriate sustainable locations will have to be developed.</p> <p>Furthermore, any temptation to increase densities to such a level that ‘town cramming’ results, just to avoid taking harder decisions relating to the Green Belt and greenfield sites, must be avoided.</p> <p>The need to deliver homes closer to where people work and in a manner that contributes to sustainable development principles means that the existing Green Belt cannot be sacrosanct.</p> <p>Furthermore, many of the small and medium sized settlements in South Gloucestershire will need to see some growth in order to both preserve existing services and facilities and bring about necessary improvements to their long-term sustainability. It will be important to direct a sufficient level of new homes to those small and medium sized locations that are well-served, or are capable of being, by key services and Public Transport links.</p> <p>A number of the non-Green Belt locations are constrained by flood risk, AONB or</p>	11 Mar 2021

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	other designations. The delivery of new homes will need to be at a rate far greater than that which has been achieved in recent times. It will inevitably mean making the most of appropriate locations for new housing outside of zones of flood risk, AONB etc; necessarily this means developing on greenfield sites and/or in the Green Belt.	
Waddeton Park Ltd - Land at Hicks Common Road	<p>23. Yes, however as explained above, they need to be explicitly inclusive of emerging travel modes and needs and to recognise that these will be enabled by a different approach to the Spatial Strategy.</p> <p>24. In addition to this, there is little mention of the need to align the Plan with strategies and plans being pursued by neighbouring Authorities, in particular Bristol, or of the cross boundary working that is essential to creating a sustainable and Carbon efficient South Gloucestershire. It is therefore suggested the Plan includes a cross boundary priority and sets out the Councils key objectives.</p>	17 May 2021
William Howell	no	23 Feb 2021

Report run at 4 Feb 2022 10:05:27. Total records: 189